



BLOOBER TEAM PRIVACY POLICY

Last Privacy Policy update: 23th October 2023

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This Privacy Policy applies to all Services provided by Bloober Team S.A. through websites owned by Bloober Team S.A. and Products manufactured and delivered to you by Bloober Team S.A. - to the extent that they require the provision of Personal Data.

We respect privacy and seek to employ best practices when it comes to the processing of your Personal Data – especially in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC, also known as General Data Protection Regulation (GDPR).

This Privacy Policy is for information purposes only, which means that it is not a source of obligations neither for you, nor for us (it is not a contract). Therefore, we reserve the right to amend the Privacy Policy from time to time. The latest version of the Privacy Policy will be available in the "Privacy Policy" tab on the website.

I. GLOSSARY - BASIC CONCEPTS

Personal Data - all information that we process related to you. For example: first name, last name, e-mail address, telephone number, demographic data (including your age), billing data, etc.;

Processing - all activities performed relating to your Personal Data. For example: gathering, retaining, updating, sending messages to you, deleting data;

Services - services offered by Bloober Team, in particular over the Websites, which the User is entitled to use, including, for example Product-related services, the setting-up of accounts by the User on the Websites or in our Products and using said accounts, placing orders for Products and Services, making purchases, testing games, using the forum for players, using technical support for Users, participating in competitions organized by Bloober Team, filling in questionnaires concerning the Websites, and making other functionalities of the Websites available;

Products - products, in particular games developed and published by Bloober Team; this Privacy Policy also applies to Personal Data processed in connection with the use of the Products, including in particular games developed and published by Bloober Team;

Blobber Team - the data controller of the Personal Data, i.e. Bloober Team S.A., a company incorporated under the laws of Poland, registered by the district court for Kraków - Śródmieście in Kraków, XI Commercial Division of National Court register under register number 0000380757, Tax ID (NIP) 6762385817, with a share capital of PLN 193,092.60 (fully paid up). Registered office in Kraków, address: Aleja Pokoju 18b, 31-564



Kraków, Poland. In matters related to the processing of your Personal Data, you can contact us at iod@blooberteam.com

User - a natural person using one of our Websites, Products or Services;

Websites - websites owned by Bloober Team to which this Privacy Policy applies and their subpages; the rules for using the Websites can be found in the relevant regulations available each time in the "Terms of Service" tab at the bottom of the Website.

Representative - a body member, representing person or attorney of a contractor with whom/which Bloober Team has entered into a contract to carry out cooperation.

Contact person - any natural person who contacts Bloober Team's employees and representatives or attorneys to establish or carry out business cooperation; in particular, a contact person may be a contractor's employee or another person designated by the contractor or acting in the contractor's name.

II. WHEN YOU CONTACT US, VISIT OUR WEBSITES, USE OUR PRODUCTS AND SERVICES

1. Communication

We may process your Personal Data obtained during our conversations or correspondence, for example to get answers, file a complaint.

When you communicate with us, for example via an external tool/chat, e-mail, forms published on the Websites or within the Products, social media, etc., we may process your Personal Data that identify you (e.g. e-mail address, IP number, your nickname), metadata concerning the contact (e.g. contact date, duration of our conversation) and also the content of our communication (e.g. chat conversation history, e-mail content).

Your Personal Data is processed in order to answer your inquiry, improving our communication, improving the quality of customer service, as well as for marketing purposes and concluding an agreement. In such cases, the legal basis for processing depends on the communication context.

If you contact us to receive information regarding Bloober Team Services, Products or the Websites, as a rule, we process your Personal Data based on our legitimate interest (resulting from the abovementioned purposes; Article 6(1) letter f of the GDPR). The legitimate interest of Bloober Team exists in the necessity to respond to the Users or, depending on the context of your question, to promote our Products or Services. However, if your inquiry leads to the conclusion of an agreement, the legal basis for processing shall be Article 6(1) letter b of the GDPR – taking steps at the request of the data subject prior to entering into a contract.

We can also send you commercial information about Bloober Team's, its affiliates (in particular from the Bloober Team Group) or our partner's, Products or the Services via electronic mail after your prior consent (e.g. newsletters). The consent is entirely voluntary and is not a prerequisite for the use of the Websites – The User can opt out of commercial information via electronic means at any time, for example by clicking on the link included in the received e-mail containing marketing content (it does not affect the lawfulness of sending commercial information based on consent before its withdrawal).

Consent may be given, for example, by selecting the appropriate option in the registration form or on pages within the Websites. The legal basis for processing of your Personal Data for this purpose is our legitimate interest and the legitimate interest of the Bloober Team Group and our partners (Article 6(1) letter f of the GDPR) – marketing.

2. Websites, Products and Services

We may process your Personal Data (e.g. your name, surname, address, e-mail address) as a result of your access and use of the Websites, acquisition or use of our Products and in connection with the provision of the Services.



While we provide the Services or when you use our Products, we may process the information about the manner of using our Websites or Products and performance of the agreement binding us. The purpose, as well as the legal basis for the processing, is, as a rule, proper performance of the agreement that we have concluded (Article 6(1) letter b of the GDPR) – for example adjusting infrastructure parameters, facilitation of settlements, providing the Services or enabling you to use the Products, including to the extent tailored to your needs or preferences, providing support or advice.

Providing Personal Data in this scope is voluntary, however, failure to provide Personal Data which are necessary to use a given Service, Products or the Websites may prevent the User from using this Service or this Product, for example prevent the creation of an individual account, prevent access to the forum, or prevent from participation in competitions.

Protecting children's privacy is of high importance for us. Some of our Services or Products may not be intended for persons under a certain age, and we do not knowingly collect data relating to such persons. We use age classifications labels (e.g. PEGI) on both our Products and Websites. We also try not to publish content that is inappropriate for minors on our Websites. Video content, if any, is as a rule published on external sites that have age restriction policies.

Blobber Team may process User's Personal Data for statistical and marketing analyses, developing marketing strategies and improving the quality of the Services and its Products, as well as the performance of the Websites. For this purpose, Bloober Team may also use anonymous and non-anonymous questionnaires filled in by Users directly with the use of forms available on the Websites, within our Products or sent by Users via e-mail or in any other way. The Personal Data processing for the above purposes is lawful because it is necessary for the purposes resulting from the legitimate interests pursued by Bloober Team (legal basis - Article 6(1) letter f of the GDPR) - statistical and marketing purposes.

3. Claim defense and security threats

We can also process a part of your Personal Data to pursue claims and defense against claims or to fulfil legal obligations resulting from applicable law, for example tax and accounting regulations - the legal basis for the processing is, accordingly, our legitimate interest (Article 6(1) letter f of the GDPR) or necessity for compliance with a legal obligation (Article 6(1) letter c of the GDPR).

Regardless, we can also process your Personal Data in order to prevent and detect any security threats, fraud, or other malicious actions. In such a case, the legal basis for the processing is our legitimate interest (Article 6(1) letter f of the GDPR).

Our Websites may contain links to other websites, including through our social media buttons. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security or privacy practices of other websites, and a link does not constitute an endorsement of such a website. When you navigate from our site to another website, you are subject to that site's terms and conditions, including but not limited to its privacy policies and practices. Please check these policies before submitting any data to these sites.

III. What are „cookies” and other similar technologies? How do we use them and for what purpose?

We may use the cookie files for our Services or Products, including both within the Bloober Team Websites, as well as within the websites of our business partners. We may also collect Personal Data by using pixels (web beacons), server logs and other similar technologies.

Cookies are small data files that are issued to your device when you visit a particular Website, which stores information about your use of it and sometimes tracks information about you. Cookie files allow us to recognize your device and collect data such as your internet service provider's domain name, type of browser, type of operating system, IP address, websites visited by you, as well as operational data, or device location information. Information collected by cookie files is not always Personal Data in the meaning of the GDPR. However, if you



have previously provided your Personal Data, cookie files can be directly linked to you, for example by associating the identification numbers in the cookies with other information.

Pixels (also known as web beacons) - Websites and other content (such as videos, emails, and advertisements) may contain pieces of code that send information about your use of such to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a Website, video, email, or advertisement that contains a pixel, the pixel may permit us or another entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels that allow us track our conversions, bring you advertising both on and off the Services, and provide you with additional functionality.

In principle, the legal basis for processing your Personal Data collected through cookie files and similar technologies, is your consent (Article 6(1) letter a of the GDPR), except when their use is necessary for the proper functioning of the Websites (provision of the services by electronic means), when we rely on the provisions of applicable law and accordingly our legitimate interest (Article 6(1) letter f of the GDPR).

We process the abovementioned Personal Data to improve the quality of our Services, Bloober Team's operation and Products, and also to adjust the content available via Websites or Products to your interests. We may read your preferences, for example by analysing how often you visit our Websites, what Services or Products you use, including what games, expansions, downloadable content you choose, etc. This allows a better understanding of your expectations and adaptation to your needs. We process your Personal Data based on our legitimate interest – promotional/analytical/performance purposes – art 6(1) letter f of the GDPR.

In the event of the legal basis for processing of your Personal Data is your consent, we remind you that you can withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. Whereas, if your Personal Data is processed on the basis of our legitimate interest, you have the right to object to such processing.

Usually, web browsers or other software installed on your device, allow, by default, the use of cookie files on such a device, and thus to collect the abovementioned information. You can change the way of using cookies files, including completely blocking or deleting them, via your web browser – please refer to the user manual for more information on how to do it. Find out how to manage cookies on popular browsers:

- [Microsoft Edge cookies information](#)
- [Internet Explorer cookies information](#)
- [Chrome cookies information](#)
- [Firefox cookies information](#)
- Safari cookies information – [mobile devices](#) and [desktops](#)
- [Opera cookies information](#)

To find information relating to other browsers, visit the browser developer's website. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

Remember that disabling or blocking some of the cookies may prevent or significantly impede the proper functioning of our Websites, for example by slowing it down. More information about the settings for cookies can be found in the browser information and/or on our Websites. You can also visit <https://www.allaboutcookies.org> for some practical advice.

With regard to the domain they come from, we divide cookies into:

1. **first-party cookies** - set by the web servers of our Websites;
2. **third-party cookies** - set by web servers of pages other than our Websites.

With regard to the life cycle, we divide cookies into:

1. **session** - a session cookie contains information that is stored in a temporary memory location and then subsequently deleted after the session is completed or the web browser is closed;



2. **persistent** - also called a permanent cookie, or a stored cookie; a cookie that is stored on a User's hard drive until it expires (persistent cookies are set with expiration dates) or until the User deletes the cookie; persistent cookies are used to collect identifying information about the User, such as Website surfing behaviour or User preferences for a specific Website.

We may use the following types of cookie files:

1. **necessary cookies** help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies;
2. **preference cookies** enable a website to remember information that changes the way the website behaves or looks, like your preferred language or the region that you are in;
3. **statistic cookies** help website owners to understand how visitors interact with websites by collecting and reporting information anonymously;
4. **marketing cookies** The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers;

It may happen that we cooperate with other companies in the scope of their marketing (advertising) or analytical activities. For the purposes of this cooperation, the browser or other software installed on your device may also save cookies from entities conducting such activity, which may become the controller of your Personal Data (these are the so-called third party cookies). Cookies sent by these entities are to ensure that you are presented with only those advertisements that meet your individual needs.

Depending on the purposes and legal grounds for processing cookies, they may be stored and processed for the time indicated below.

IV. How long do we process your Personal Data?

If your Personal Data are collected only in connection with our current communication we may process them, depending on the category of particular information, for a period of several days (some cookies) or for a maximum of two years (more detailed inquiries and conversations that may be relevant to our contact in the future).

Where Bloober Team processes data for the marketing of its Products and the Services, the data will cease to be processed for this purpose as soon as the User objects to the processing of their data. The User may also withdraw their consent to the sending of marketing information by electronic means at any time, and the information will no longer be sent after the withdrawal of consent.

The User's Personal Data for the purposes of the performance of the contract will be stored as long as the User uses the Services or Products provided, and longer due to tax regulations.

If your Personal Data is being processed because you use our forum, test games, participate in a competition, or we provide you with technical support and/or prepare an answer to an inquiry or complaint, your Personal Data will be stored and processed for as long as it is necessary to use it to perform any of the above functionalities and no longer than for the period specified in the law or for the period of the statute of limitations of claims.

The retention periods described above may be extended as appropriate in the event of potential claims (during the prescription period defined by law, in particular the Civil Code), any claims and court proceedings – for the duration of such proceedings and their settlement – and if the law obligates us in certain cases to process such data for a longer period of time. In any case, a longer period of storage of Personal Data is decisive.

V. Who has access to your Personal Data?

The access to your Personal Data is only granted to:

1. authorized employees and collaborators of Bloober Team, or its affiliates, who have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;



2. entities that support us in providing the Services or giving you access to our Products, based on appropriate contracts, for example other entities from the Bloober Team Group, entities providing IT services or tools allowing for our communication, legal and consulting services providers, auditors/reviewers, entities handling internet payments, marketing and advertising agencies (including marketing and advertising services provided by Google, Facebook, etc.).

All of these entities have access only to information necessary for their performance.

We may also be required – if there is a legal basis to do so – to provide certain information to public authorities, for purposes related to proceedings they are conducting.

Since some of our affiliates are registered outside the European Economic Area (EEA), and so could be some of the entities providing us with solutions connected with Bloober Team, Websites and providing Services and our Products, and your Personal Data may be transferred there, we provide the appropriate legal mechanisms for the security of your Personal Data, including standard data protection clauses adopted under the decision of the European Commission and concluding data processing agreements that meet the requirements of the GDPR.

You have the right to obtain a copy of the appropriate legal mechanisms for the transfer of your Personal Data, to countries outside the EEA, by contacting us.

In the event that Users are redirected to websites of entities other than Bloober Team (e.g. in order to purchase a selected product), Bloober Team does not provide such entities with any Personal Data of the Users. To the extent that the functions or related websites visited by the User are not Bloober Team Websites, Bloober Team is not responsible for the processing of personal data related to the use of these websites. In order to understand the principles of data processing on these websites, the User should refer to the privacy policies made available on these websites.

VI. Your rights as related to processing of your Personal Data

For the effective exercise of your rights, we recommend sending any requests to the iod@blooberteam.com e-mail address, along with the title “GDPR Request.” In the e-mail, please specify which right(s) you wish to invoke. Remember that this is only a suggestion on how you can exercise your rights. Complying with the above mentioned rules is not mandatory and any failure in this matter will not lead to the loss of the rights described below.

You have the following rights:

- **Access to your Personal Data** - you may ask us to provide detailed information regarding, for example:
 - whether we are processing your Personal Data;
 - for what purpose;
 - what categories of Personal Data we are processing;
 - who is the recipient of your Personal Data;
 - what is the planned duration of processing (if possible), and if we are not able to answer, the criteria for determining that duration;
 - if the Personal Data has not been collected from you – all available information as to their source.

You can also receive access to all of your Personal Data that we are processing (data copy).

- **Data rectification** - if information about you is or has become inaccurate, you have the right to demand that data to be rectified.
- **Consent withdrawal** - you may withdraw your consent to the processing of your Personal Data at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- **Erasure of data** - in certain situations, the GDPR gives you the “right to be forgotten.” You can invoke this right if we are still processing your Personal Data, particularly in the following cases:



- your Personal Data is no longer vital for the purposes for which it was collected or otherwise processed;
- you revoked consent to the processing of Personal Data and there is no other legal basis for continuing to process it;
- you object to the processing of your Personal Data when there is no overriding justified legal basis for processing;
- you object to the processing of your Personal Data for marketing purposes;
- your Personal Data is processed in a manner that violates the law;
- the law requires that we erase your Personal Data.
- **Restriction of processing** - in principle, you can demand that we limit our activities only to storing information about you when:
 - you question the correctness of the Personal Data we are processing – for a period of time that allows us to determine the correctness of that data;
 - the processing of your Personal Data violates the law, but you prefer that processing be restricted rather than the data be erased;
 - Bloober Team no longer needs your Personal Data for the purposes of processing, but you need it for establishing, pursuing, or defending legal claims;
 - you have objected to the processing of your Personal Data – only until such time as it is determined whether your interests take precedence over our legally justified interests.
- **Data portability** - you have the right to receive your Personal Data in a commonly-used format that can be read by a computer and also to have your Personal Data sent to another data controller, if:
 - processing is done on the basis of your consent or a contract; and
 - processing is done in an automated manner.
- **Objection** - you have the right to object to some operations we perform on your Personal Data for special reasons related to your personal situation, particularly in the following cases:
 - when our processing is based on a legitimate interest;
 - when we process your Personal Data for purposes related to scientific or historical studies, or for statistical purposes.

Remember, however, that when in spite of your objection, we conclude that there are important legitimate grounds for processing that override your interests, rights, and freedoms, or the basis for establishing, pursuing, or defending claims, we will continue to process your Personal Data encompassed by the objection to the extent necessary. If you disagree with such an assessment of the situation, you can exercise your right to file a complaint with the relevant public authority (more information below).

Where Personal Data are processed for direct marketing purposes, you have the right to object to the processing of your Personal Data for such marketing at any time. Where you object to the processing for direct marketing purposes, the Personal Data shall no longer be processed for such purposes.

- **Complaints to the relevant public authority** - in connection with our actions as the data controller regarding your Personal Data, you have the right to file a complaint to the relevant public authority which, in Poland, is the President of the Personal Data Protection Office. A detailed description of the complaint procedure is available at: <https://uodo.gov.pl/en/559/941>. You can find a list of local authorities responsible for data protection across the EU and their contact details at: https://edpb.europa.eu/about-edpb/board/members_en.

Of course, if you have any comments about how we do things, we encourage you to contact our Data Protection Officer at iod@blooberteam.com.

VII. California Residents – additional information

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (“California Privacy Laws”) requires us to disclose the following additional information related to our privacy practices. If you are a California resident this section applies to you in addition to the rest of this Privacy Policy.



1. Categories of Personal Information Collected, Used, and Disclosed

In the preceding 12 months, depending how you interact with our Sites, we may have collected the following categories of Personal Information:

- **Identifiers**, such as your name, address, unique personal identifier, email, phone number, or similar identifiers.
- **Commercial information**, such as information relating to transactions with us involving you or the person that you work for, and information about events to which you or those related to you are invited, and your personal information and preferences to the extent that this information is relevant to organising and managing those events.
- **Internet or other electronic network activity information**, such as technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.
- **Geolocation data**, such as geolocation, to the extent you have configured your device to permit us to collect such information.
- **Inferences drawn from any of the information listed above**, such as your preferences, characteristics, behavior and attitudes.

For more information about the Personal Information we collect and how we collect it, please refer to “Contractors” and “When you contact us, visit our websites, use our products and services” sections above.

We collect your Personal Information for the business purposes described in the “Contractors” and “When you contact us, visit our websites, use our products and services” sections above.

The categories of third-parties with whom we may share your Personal Information are listed in the “Who has access to personal data” section above.

2. California Privacy Rights

If you are a California resident, you have rights in relation to your Personal Information as identified below; however, your rights are subject to certain exceptions and are not absolute. We may deny your request: (a) when denial of the request is required or authorized by law; (b) when granting the request would have a negative impact on another’s privacy; (c) to protect our rights and properties; (d) where the request is frivolous or vexatious, or for other reasons.

- **Right to Know.** You may have the right to obtain a copy, or a list of categories of the Personal Information that we hold about you, as well as other supplementary information, such as the purposes of processing, and the entities to whom we disclose your Personal Information.
- **Right to Correct.** You may request us to rectify, correct or update any of your Personal Information held by us that is inaccurate.
- **Right to Delete.** Under certain circumstances, you may have the right to request that we delete the Personal Information that we hold about you. This right is not absolute, and we may refuse your right to delete if (i.a.) it is reasonably necessary for us to provide a service requested by you; to perform a contract between us; to maintain functionality and ensure security of our systems; to enable solely expected internal uses of your Personal Information; to exercise a right provided by law; or to comply with a legal obligation.
- **Right to Portability.** Under certain circumstances, you may have the right to receive Personal Information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that Personal Information to another entity.
- **Right to Opt Out of Sale/Share.** You have the right to opt-out of the sale of your Personal Information in exchange for monetary or other valuable consideration, including sharing of your Personal Information to third parties for behavioral advertising purposes. We do not sell your Personal Information for profit, but like many websites, we use cookies, pixels, and similar technology, and we share certain information, such as your IP address or device identifiers, to certain third-party advertisers in order to improve your user experience and to optimize our marketing activities. To exercise your right to opt-out of share of your personal information, please change the way of using cookies files (you



can completely block them) via your web browser – more information on how to do it, please see the “What are cookies” section above. Please note that you may still receive generalized ads after opting out of targeted advertising.

- **Right to Limit Use of Sensitive Information.** To the extent your sensitive personal information (as that term is defined under California Privacy Laws) is used to infer characteristic about you, you have the right to direct us to stop such processing of your sensitive personal information for such purposes. We do not process any sensitive personal information to infer characteristics about you.
- **Right to Object to Automated Decision-Making.** You may have the right not to be subject to a decision that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement) which significantly impacts your rights. No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.
- **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your privacy rights.
- **Direct Marketing** If you are a California resident, you can request a notice disclosing the categories of personal information we have shared with third parties for the third parties’ direct marketing purposes.

3. Exercising Your California Privacy Rights

You may exercise your rights by contacting us at iod@blooberteam.com. In your request, please make clear which right you would like to exercise. Before fulfilling your request, we are required by law to have you to verify the Personal Information we already have on file to confirm your identity. If we cannot verify your identity based on the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes.