

**Website banner: YOUR PRIVACY IS IMPORTANT TO US**

**###**

## **PRIVACY POLICY**

**Updated 20.8.2018**

Welcome to Lightneer and thank you for playing our games!

We at Lightneer Oy ('Lightneer, 'we', 'our' 'us') care and respect your privacy. This Privacy Policy describes the following:

- Ways we collect personal data about you and why we do so
- How we use your personal data
- The rights and choices you have about your personal data

This Privacy Policy applies to all Lightneer games, websites and related services (here collectively called the 'Service'). We may periodically update this Privacy Policy to reflect changes to the way we handle data by posting a new version here at [www.lightneer.com](http://www.lightneer.com). If we make any material changes, we will notify you by posting a notice in the Service prior to the change becoming effective. Your continued use of the Service after the effective date will be subject to the new Privacy Policy.

As described in more detail below, we only collect, process and use your personal data to such an extent that is necessary to provide our Service, to communicate with you, to provide customer support and for game development and business purposes. This helps us to understand our customers better and to create better games and experiences for you in the future. We also send some of your data to third-parties when you for example watch an ad in our games. Working with partners and advertising networks in this manner allows us to continue to offer our games to be downloaded free of charge (in-app purchases may be available).

Our personal data processing operations are based on the relevant national and international regulations, adhering to the rules and principles of the European General Data Protection Regulation (GDPR).

If you do not agree with this Privacy Policy, please refrain from using our Service.

## **CONTACT US**

If you have questions about data protection, or if you have any requests for resolving issues with your personal data, we encourage you to contact us.

Name of the controller: Lightneer Oy  
Address: Itämerentori 2, 00180 Helsinki, FINLAND  
Business ID: 2710782-8  
Email: [support@lightneer.com](mailto:support@lightneer.com)

## **WHAT DATA WE COLLECT?**

We collect your data typically when you first use our Services (i.e. when you install a mobile game); when you play the game (e.g. in-game event analytics and personalized gameplay experiences); when you visit our website ([www.lightneer.com](http://www.lightneer.com)); and when you interact directly with us (e.g. customer service correspondence).

### **Data you may provide us**

- Contact information (such as name and email address)
- Player name
- Profile information (such as profile photo)
- Your messages to the Service (such as player support tickets and chat logs)
- Other data you choose to give us (such as data to identify a lost account)

### **Data we collect automatically**

- Data about your account and game progress
- Your IP address and mobile device identifiers (such as your device ID, advertising ID, MAC address, IMEI)
- Data about your device, such as device name and operating system, browser type and language
- Data we collect with cookies and similar technologies (such as Google Analytics)
- General location data (e.g. what country you are from)
- Data about your use of the Service, such as gameplay data and your interactions with other players inside the Service

### **Data we collect from our partners**

- Data we receive if you link a third-party tool with the Service (such as Facebook or Google)
- Demographic data (such as to determine the coarse location of your IP address)
- Data to fight fraud (such as refund abuse in games or click fraud in advertising)
- Data from platforms that the games run on (such as to verify payment)
- Data for advertising and analytics purposes

## **WHY DO WE COLLECT YOUR DATA?**

We collect and use your personal information for the following purposes. Our legal basis for collecting and using the personal information is also described below.

### **To make the Service work**

To perform the contract, we process data necessary to:

- Allow you to play our games and use our Service
- Create accounts
- Operate the Service
- Verify and confirm payments
- Provide and deliver products and services you request
- Send you Service-related communications

## **To make the Service more suitable for our players**

To provide a great Service to our players, we have a legitimate interest to collect and process necessary data to:

- Develop and improve the Service and user or player experience
- Manage our relationship with you
- Update and develop player profiles
- Provide social features as part of the Service
- Customize your Service experience
- Respond to your comments and questions and provide player support
- Send you related information, such as updates, security alerts, and support messages
- Enable you to communicate with other players

## **To show personalized advertisements**

Our Service uses built-in advertising run by third-party advertising networks that can enhance the in-game experience. Such advertisements allow us to offer you our Service to be downloaded for free (in-app purchases may be available).

To show you personalized advertisements (more relevant advertisement instead of random advertisement, the amount remaining same in both cases) in the Service as well as in other websites and services (such as email) we have a legitimate interest to process necessary data to:

- Track the content you access in connection with the Service and your online behaviour
- Deliver, target and improve our and our partners' advertising and the Service

For information on how to opt-out from personalized advertisements, see section 'Your rights and options' below.

## **To keep the Service safe and fair**

Ensuring a level playing field in the Service is a top priority for us. For more information on our acceptable use policy, see our Terms of Service (add link).

In order to keep the Service and its social features safe and fair, to fight fraud and ensure acceptable use otherwise, we have a legitimate interest to process necessary data to:

- Analyze and monitor use of the Service and its social features
- Moderate chats either automatically or manually
- Act against fraudulent or misbehaving players

## **To analyze, profile, and segment**

In all of the above cases and purposes, we may analyze, profile and segment all collected data.

## **With your consent**

With your consent, we may process your data for additional purposes, such as sending your updates through push notifications or using your GPS location to show you local events. You have a right to withdraw or change your consent.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us.

## **WHO CAN ACCESS OR USE YOUR DATA?**

Apart from Lightneer, your data can be accessed or used by others in the following situations:

### **Other Players and Users**

Social features such as leaderboards or friend lists can be a component of our games. Other players and users may, for example, see your profile data, in-game activities or high scores and read the messages you have posted.

### **Partners Working with and for Lightneer**

Lightneer has partners to perform services for us. These partners process your data only at and according to Lightneer's instructions to provide the Service, such as hosting, player support, analytics and fraud prevention. We use Google Analytics on our website ([Privacy Policy](#) & [Opt-Out](#))

### **Advertising, Social Media and Other Partners Operating Under Their Own Policies**

Some of our partners may access your data and operate under their own privacy policies. These partners use advertising identifiers, cookies, APIs, and/or SDKs in our Service to enable them to collect and analyse user and device related data and information. We encourage you to check their privacy policies to learn more about their data processing practices, use of cookies and other similar tracking technologies. A list of these partners and their privacy policies is provided below. The opt-out instructions for these partners' services are also included in their privacy policies.

- AppLovin - [Privacy Policy](#) & [Opt-Out](#)
- Facebook Audience Network - [Privacy Policy](#)
- GameAnalytics - [Privacy Policy](#)
- Google AdMob - [Privacy Policy](#)
- Ironsource - [Privacy Policy](#) & [Opt-Out](#)
- Unity - [Privacy Policy](#)

Our games are developed with Unity software. The game engine requires some technical information about the player's device so that it can work properly (such as device manufacturer, hardware components, device and network identities, user language). This collected data is sent to Unity.

Please note. These tools from our partners are not provided by Lightneer, and we do not control or operate the services and tools themselves or the choices that partners, advertisers and others might provide through these tools.

### **Other Companies and Public Authorities**

In order to combat fraud and illegal activity, we may exchange data with other companies and organisations and provide it to public authorities in response to lawful requests.

We may also disclose your data based on your consent, to comply with the law or to protect the rights, property or safety of us, our players or others.

### **International data transfers**

Our Service is global by nature and your data can therefore be transferred to anywhere in the world. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your data as explained in this Privacy Policy. Adequate safeguards that our partners may use include standard contractual clauses approved by EU Commission and the Privacy Shield certification in case of transfers to the USA.

## **WHAT ARE YOUR RIGHTS AND OPTIONS?**

You have the right to review the data we have collected and influence the way we use it. In certain cases you have the right to erasure or to ask for your data to be transferred to another controller. Your rights are as follows:

### **The right to access, inspect and right to rectification**

You have the right to access and inspect the personal data we have collected about you at any time, or receive confirmation that we do not have any personal data about you in our filing systems. If your personal data is inaccurate or incomplete, you have the right to make a request for rectification or completion of your personal data.

### **The right to restrict or object processing**

In certain circumstances, for example if your personal data is inaccurate, you have the right to restrict its processing until we have verified the accuracy of your personal data. Further, in certain situations you also have the right to object to the processing of your personal data completely. You can for example object the processing for direct marketing purposes at any time (including profiling).

### **The right to be forgotten**

In some cases you have the right to be forgotten. We will erase all personal data we have collected if it is no longer needed for the purposes it was originally collected for. We will also erase personal data if the processing was based on consent and you decide to withdraw your consent or restrict the processing, or if there is no other reason nor grounds for the processing.

## **The right to transfer from one system to another**

You have the right to request the transfer your personal data. This is possible only in such cases when we process your personal data based on your consent or agreement, and applies only to such personal data you have provided us yourself.

We will provide your personal data in machine-readable format so that you can store it yourself or transfer it to another controller (e.g. another service provider). Upon your request, we will transfer the data to another controller directly if it is technically feasible.

## **The right to opt-out of direct marketing**

You may opt-out of receiving promotional communications, such as marketing emails from us by following the instructions in such communications.

## **The right to opt-out of targeted advertising**

If you wish to “opt out” of targeted advertising, please visit our ad networking partners websites for more information about their “opt out” possibilities. Please note that if you choose to “opt out” it does not mean that you will no longer receive advertising. It just means that the advertising you see displayed will not be customized to you and your interests and may be less relevant to you.

You can also opt-out of interest-based advertising on mobile applications by checking the privacy settings of your Android or iOS device and resetting/disabling your unique advertising ID (Identification for Advertising, IDFA on Apple and Google Advertising ID, GAID). Resetting your advertising ID erases all data previously associated with it, meaning you will no longer receive personalised adverts.

### **Android devices:**

- Open Google Settings
- Go to 'Ads'
- Tap on 'Reset Advertising ID'
- Confirm the reset

You can also choose not to receive personalised advertising by opting-out of interest-based ads. Just toggle off the ‘Opt-out of interest-based ads’ option.

### **iOS devices:**

- Open Settings
- Go to 'Privacy'
- Tap on 'Advertising'
- Choose 'Reset Advertising Identifier'

You can also choose not to receive personalised advertising by opting-out of interest-based ads. Just toggle the ‘Limit Ad Tracking’ option on.

## **Cookies and similar tracking Technologies**

We and our partners use advertising identifiers, cookies and similar tracking technologies. Advertising identifiers, cookies and similar technologies are used by us and our partners to provide our Service to you and to collect data from your device. These technologies allow us and our partners to (i) recognise you and your device; (ii) provide interest-based advertising to you; (iii) prevent fraud, (iv) allow our Service to interact with a third party social network or platform (where you have chosen to allow such interaction); (v) allow our payment processors to process your payment instructions; and (vi) enable us and third parties to provide you with more customized services, for example to provide our Service in the correct language (subject to availability).

You may also see our own advertisements in other games and services. If you click such advertisements and install our game(s), we may share a device identifier with our partners to verify installs and prevent fraudulent actions.

You may delete the cookies from your device after using our Service or at any time in your web browser's Settings menu. If you disable cookies on your browser, some parts of our Service may not function properly. Please note that cookies and other identifiers may also be used to target advertising to you within our Service as well as in third-party services (like Facebook).

Third parties are developing or have developed signals or other mechanisms known as "Do Not Track signals". However, there is not yet a uniform technological standard. Therefore, we do not monitor or take any action with respect to these signals or other mechanisms but may consider doing so when a standard is developed and widely adopted. You will need to use your browser settings to effectively manage cookies.

### **The right to complain**

In addition to the above-mentioned rights, you have the right to make a complaint about your personal data processing to the supervisory authority.

Should you have questions about your rights, please contact us. We will respond to all requests within a reasonable timeframe without any delays.

## **HOW DO WE PROTECT YOUR DATA?**

In order to help ensure a secure and safe player experience, we have taken technical and organisational measures for protecting your personal data from loss, misuse or other similar unlawful access. These methods are generally acceptable industry standards and include, among others, use of firewalls, encryption and safe server premises. We are continuously developing and implementing these measures to protect your data

### **Data retention**

We will retain your information for as long as is needed to provide you the Service; as long as needed for the purpose it was originally collected for; as long as we are legally obligated; or until we receive a request for erasure. That means that we'll hold your data for the entire life cycle of the respective mobile game you've used as part of our Services. After this point,

your personal data will either be erased completely or anonymized for analytical use for a certain period.

Note that if you ask us to remove your personal data, we will retain your data as necessary for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Data security and protection**

We use appropriate technical and organisational measures designed to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include that only those of our employees, who on behalf of their work are entitled to process personal information, are entitled to use a system containing personal information. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies are in locked premises and can be accessed only by certain pre-designated persons.

We may use partners and contractors to process data for us in accordance with this privacy policy and with their scope of work as set out in our agreements with such third parties. In such cases we take steps to ensure that your data is kept secure.

Your data and coarse location might be shared based on your consent or if required by law, regulation or based on a request from competent authorities, such as for detection or prevention of misuse or criminal activities. When we share our data with third parties, they only process your data in accordance with their scope of work as set out in our agreements with such third parties.

The aggregated or de-personalized data based on our users' information (such as statistics) that we might publish at some point will never identify you.

### **WHAT IS THE POLICY FOR CHILDREN?**

We do not knowingly collect or solicit personal data about or direct or target interest-based advertising to anyone under the age of 13 or knowingly allow such persons to use our Services. If you are under 13, please do not send any data about yourself to us, including your name, address, telephone number, or email address. No one under the age of 13 may provide any personal data. If we learn that we have collected personal data about a child under age 13, we will delete that data. If you believe that we might have any data from or about a child under the age of 13, please contact us.