

SYBO Privacy Policy

Last updated: 16 May 2018

At SYBO ApS ("SYBO" or "we" / "our") data protection and confidentiality is a high priority.

This Privacy Policy explains how information about you is collected, used and disclosed by SYBO when you use our website, mobile applications and other online products and services (collectively, the "Services") or when you otherwise interact with us.

We may amend this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, depending on the specific amendments, we may provide you with additional notice. We encourage you to review the Privacy Policy whenever you access our Services to stay informed about our information practices and the ways you can help protect your privacy.

1. Data controller and contact information

SYBO ApS
CVR: 33858183
Jorcks Passage 1A, 4.
1162 København K
support@sybogames.com

2. Collection of personal data

We collect information you provide directly to us, such as when you participate in a contest and promotion, communicate with us via third party social media sites, request customer support, send us an email or otherwise interact with us. The types of information we may collect about you include your name, social networking screen names or IDs, email address and any other information you choose to provide.

When you access or use our Services, we automatically collect information about you, including:

- **Log Information:** we log information about your use of our Services, including the type of browser you use, access times, pages viewed, your IP address, and the page you visited before navigating to our Services.
- **Device information:** we collect information about the device you use to access our Services, including information about the device's software and hardware, Media Access Control ("MAC") address and other unique device identifiers, device token, mobile network information and time zone.
- **Usage information:** we collect information relating to your use of our Services, including which applications you use and your interactions with other users.
- **Consumption information:** we collect information about your consumption habits relating to your use of our Services, including which purchases you make with both virtual and real currencies.
- **Information collected by cookies and other tracking technologies:** we use various technologies to collect information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your computer's hard drive or in device memory that help us to improve our Services and your experience and see which areas and features of our Services are popular. We may also collect information using web beacons (also known as "tracking pixels"). Web beacons are electronic images that

may be used in our Services or emails and help deliver cookies, count visits, and understand usage and campaign effectiveness.

We may also obtain information from other sources and combine that with information we collect through our Services. For example, if you log into our Services using a third party site or platform such as Facebook, we may access information about you from that site or platform, such as your screen name, profile information and friend lists, in accordance with the authorisation procedures determined by such third party site or platform. We may also collect information from app stores when you download or update one of our applications.

We may use information about you for various purposes, including to:

- Provide, maintain and improve our current Services;
- Develop new Services;
- Provide and deliver the products and services you request and send you related information;
- Facilitate communications between users;
- Respond to your comments, questions and requests and provide customer service and support;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Communicate with you about products, services, offers, promotions and events offered by SYBO and others, and provide news and information we think will be of interest to you;

Personalise and improve our Services and provide tailored advertisements, content or features;

- Process and deliver contest entries and rewards;
- Monitor and analyse trends, usage and activities in connection with our Services;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose for which the information was collected.

3. Use of personal data

We may share information about you as follows or as otherwise described in this Privacy Policy:

- With other users;
- In response to a request for information if we believe disclosure is in accordance with any applicable legal requirement;
- If we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of SYBO or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company; and
- With your consent or at your direction.

We also may share aggregated information or otherwise anonymised information, which cannot reasonably be used to identify you.

Our Services may offer social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take on our Services with other media, and vice versa. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

We may allow third parties to serve advertisements and provide analytics services in connection with our Services. These entities may use cookies, web beacons and other tracing technologies to collect information about your use of our Services, including your IP address, MAC address, device identifiers, software and hardware information, browser information, time zone and usage information. This information may be used by SYBO and others to, among other things, analyse and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests and better understand your activity on our Services.

Third-party ad serving and analytics technologies are integrated into our Services, so if you do not want to be subject to these technologies, do not use or access our Services.

Our Services may also integrate third party Application Program Interfaces (APIs), which allow others to collect and process information about you, including your geo-location information, to provide you with tailored advertisements, offers and other content. You have the ability to control the collection and use of your geo-location information at all times. You may disable location-based services at any time by adjusting the settings of your mobile device.

4. Transfer to third countries

SYBO may disclose your personal data as to ad networks for the purpose of direct marketing. These ad networks may be located in countries outside EU/EEA that have less restrictive data protection legislation. You can find as list of SYBO’s existing ad networks partners and in which countries they are located here: <http://sybogames.com/ad-networks/>

5. Deletion of personal data

We will delete your personal data when we no longer need to process them in relation to one or more of the purposes set out above.

Generally, we will store user data for 5 years from last activity, if there is still a valid purchase. Otherwise we will store user data for 2 years.

However, the data may be processed and stored for a longer period in anonymised form in order for us to improve the service.

6. Cookies

We use cookies on our website. You can read more about the use of cookies in our Cookie Policy, which you can find here: <http://sybogames.com/privacy-policy/>

7. Security

We have implemented security measures to ensure that our internal procedures meet our high security policy standards. Accordingly, we strive to protect the quality and integrity of your personal data. This includes encryption of data and use of pseudonymisation, whenever applicable.

8. Your rights

You are at any time entitled to be informed of the personal data about you that we process, but with certain legislative exceptions. You also have the right to object to the collection and further processing of your personal data including profiling/automated decision-making. Furthermore, you have the right to have your personal data rectified, erased or blocked. Moreover, you have the right to receive information about you that you have provided to us, and the right to have this information transmitted to another data controller (data portability). In order for you to exercise these rights we are obliged to verify your identity. We can only verify your identity if you are logged in on one of our apps. You will therefore only be able to exercise your rights if you log in and follow the steps as explained.

9. Withdrawal of consent

You may, at any time, withdraw any consent you have given and we will no longer process your personal data, unless we can continue the processing based on another purpose. If you wish to withdraw your consent, you can withdraw it in the game. However, please note that if you withdraw your consent, your user license to use the Service will cease automatically.

Consent can be withdrawn in the settings menu, via the Withdraw Consent button. When tapped it will spawn a Withdraw Consent confirmation popup, which when confirmed will spawn the Consent Popup again.

This concludes the withdrawal of consent and the game will be blocked until consent is given (again).

Access to the settings menu is available from the Front Screen.

10. Links to websites, social media, platforms etc.

Our Services may contain links to websites, social media, platforms etc. We are not responsible for the contents of the websites social media, platforms etc. of other companies or for the practices of such companies regarding the collection of personal data. When you visit other websites, social media, platforms etc., you should read the owners' policies on the protection of personal data and other relevant policies.

11. Amendment of data, etc.

If you want us to update, amend or delete the personal data that we have recorded about you, wish to get access to the data being processed about you, or if you have any questions concerning the above guidelines, you may contact us in the settings menu via the Send Request button.

Access to the settings menu is available from the Front Screen.

12. Complaints

If you wish to appeal against the processing of your personal data, please contact us as indicated above. You may also contact the Data Protection Agency (Datatilsynet), Borgergade 28, 5., 1300 Copenhagen K.