

# PRIVACY STATEMENT – AppCompleet

Version 1.0 – 8<sup>th</sup> of June 2021

## 1. AppCompleet

AppCompleet is a Dutch company. We are active in the European Economic Area (EEA) and we keep our data on servers in the EEA, unless stated otherwise.

We process your personal data when you use our services, such as applications, websites and software. In this privacy statement we summarize when and how we collect, use and secure your personal data with regard to our services.

## 2. General

We may change provisions of this privacy statement from time to time. If we do that, we will inform you of the changes. However, we also advise you to check for yourself from time to time whether the privacy statement has been changed.

## 3. Which personal data do we collect and for which purposes?

There are a number of ways in which we can collect your personal data. In this section we explain which personal data we may collect from you.

### Processing for our website

We do not use cookies on our website. For analytics purposes we collect general and anonymized statistics about the use of our website. This information is not considered personal information.

We only process personal information via our website if you contact us per e-mail. The basis for processing this personal information is that it is necessary for defending our legal interests. We consider it important to reply to questions you ask. We process your e-mail address and any personal information that you share with us when you contact us. We will retain this personal data for up to 12 months after your request or question has been handled. This retention period allows us to better answer your questions in case of follow up questions.

### Processing for our applications

When you use our applications, we process the personal information mentioned below. The personal data is sorted according to the different processing goals. The data retention period also differs depending on the processing goal. This period will also be mentioned below. Note that should there be any legal changes to the possible data retention periods, these legal changes will take precedent over the periods mentioned in this privacy statement.

#### 3.1 Processing necessary for the performance of a contract between you and us, or you and third parties on the application (delivering our services)

##### 1. General information needed to provide our services to you: we retain the personal data for this purpose up to 2 years after your last use of our application

- e-mail address
- geolocation
- user-ID
- user profile
- FCM token
- game progression
- purchase information (only if a purchase is made)

This data is processed in the United States by Google Firebase. Google guarantees us that the processing is sufficiently protected and compliant with the GDPR.

If you wish to use our applications, you must provide this personal information to us or allow us to collect it. Otherwise you will not be able to use our applications. If you use our applications in multiplayer, your profile name, icon and player level may be shared with other users of our application.

### 3.2 Processing necessary for defending our legitimate interests

1. To answer your questions when you contact us: we retain the personal data for this purpose for up to 12 months after your request or question has been handled.

- name
- e-mail address
- other personal data that you enter when contacting us

This data is processed in the United States by our e-mail provider. Our e-mail provider guarantees us that the processing is sufficiently protected and compliant with the GDPR.

2. Improving our services: we retain the personal data for this purpose up to 2 months after we collected the personal information (anonymized analytics data may be stored up to 2 years)

- online identifier
- IP-address
- platform type
- device information
- device-ID
- product-ID
- product information
- MAC address/IMEI
- general location information
- operating system
- in-app purchases
- the use of our services, such as your clicks, how you browse our websites and applications, the time you spend on pages, your activity and application version etc.

You can disable the sharing of personal data for analytics purposes in the application settings.

3. Keeping the Service safe: we retain the personal data for this purpose up to 6 months after we collected the personal information

- your IP-address
- a number to identify your device on our services (device-ID)
- a number to identify you on our services (user or session ID)
- the operating system you are using
- the time, date and place of login

We process this personal data on the basis of a weighing of interests. If you do not want us to process the information mentioned above, please let us know your reasons for objecting. We will take your reasoning into account and weigh it against our interests. If we come to the conclusion that you will need to provide your personal data, you cannot use our services if you refuse to provide the personal data. More information about your rights can be found below under the heading 'Your rights'.

### 3.4 Processing with your consent

1. When you view personalized advertisements to get a reward in our applications, we retain personal data to improve our services: we retain the personal data for this purpose up to 2 months after collecting the data

- mobile advertising ID

- age
- gender
- language
- interests
- country

2. When you view personalized advertisements to get a reward in our applications: we retain the personal data for this purpose up to 2 months after collecting the data

- online identifier / mobile advertising ID
- client identifier
- cookie identifier
- IP-address
- device-ID

We will only process this personal data if you have given permission for this and the data will only be processed once you have actually given your consent or have provided the personal data yourself. You are not obliged to provide this personal information to us. If you do not provide this personal information to us, you will still see non-personalized advertisements in our games.

#### **4. Sharing personal data**

We only share your personal data in the way, and with the parties, mentioned in this privacy statement.

##### 4.1 Sharing with processors for which your consent is not necessary

We use other parties to help with the provision of the Service. It is possible that these third parties process your personal data. These third parties are referred to as "processor" in this privacy statement. We conclude processing agreements with these processors.

We use the following types of processors:

- Google Firebase for authenticating users on our applications and storing and processing personal information for our applications (if you use an Apple-device, we also use 'Sign in with Apple' to authenticate you).
- Google Analytics for improving our applications. We use privacy friendly settings, so the tool does not share personal data with Google;
- companies that provide storage of (personal) data and database management and maintenance;
- hosting provider(s);
- providers of advertisement software.

In some cases, the processor may collect your personal data on our behalf. We contractually agree with the processors that they may only use personal data that they obtain from us to enable the provision of the service. Processors may not use this information for their own advertisement purposes.

If you provide additional information to these processors yourself, we are not responsible for this. It is wise to inform yourself properly about the processor and his company before you provide your personal data.

##### 4.2 Sharing data with your consent

We may also share personal data with others if you give us permission to do so. For example we can cooperate with other parties to offer you specific services or offers. If you register for these services or marketing offers, we may provide your name or contact details if they are necessary to provide that service or contact you. Before we do this, you will always be expressly asked for your consent.

##### 4.3 Our legal responsibility

We may also share personal data with third parties if this is:

1. reasonably necessary or appropriate to comply with our legal obligations;
2. necessary to comply with legal requests from authorities;
3. is required to respond to any legal claims;
4. necessary to protect the rights, property or safety of us, our users, our employees or the public;
5. is required to protect ourselves or our users against fraudulent, abusive, inappropriate or unlawful use of the Service.

We will immediately notify you if a government agency makes a request that relates to your personal data, unless we are not allowed to do so on the grounds of the law.

#### 4.4 Merger or sale (part) of the company

It may happen that we disclose, share or transfer your personal data when we transfer part of our business. Examples include (negotiations about) a merger, sale of parts of the company or obtaining loans. We will of course try to limit the impact for you as far as possible by transferring personal data only when necessary.

### **5 . Protection of personal data**

Protecting your personal data is of the utmost importance for us. We have therefore taken appropriate technical and organizational security measures in order to protect your personal data. These measures include, but are not limited to:

- Physical and electronic measures designed to prevent unauthorized access, loss or misuse of personal data as far as possible.
- We use TLS (Transport Layer Security) technology to encrypt sensitive information or personal data, such as account passwords and other identifiable information about payments.
- Where reasonably possible, backups of personal data will be made.
- Sensitive information is only stored encrypted if possible.
- Vulnerabilities in the software are dealt with as quickly as reasonably possible.
- Access to databases is protected with two factor authentication.

We would like to point out that absolute security for sending personal data via the internet or storing personal data cannot always be guaranteed. We advise you to take this into account when deciding whether or not to give consent for processing your personal data.

### **6. Your rights**

Privacy legislation gives you certain rights with regard to your own personal data. The rights that we describe below are not absolute rights. We will always consider whether we can reasonably meet your request. If we cannot meet your request, or if it would be at the expense of the privacy of others, we can refuse your request. If we refuse a request, we will let you know and explain our reasons.

#### Right of access

You have the right to request which personal data we process about you. You can also ask us to provide insight into the processing grounds, relevant categories of personal data, the (categories of) recipients of personal data, the retention period, the source of the data and whether or not we use automated decision making.

You may also request a copy of your personal data that we process. Do you want additional copies? Then we can charge a reasonable fee for this.

#### Right to rectification

If the personal data processed by us about you is incorrect or incomplete, you can request us to adjust or supplement the personal data.

If we grant your request, we will, to the extent reasonably possible, inform the parties to whom we provide information.

#### Right to erasure

Do you no longer want us to process certain personal data about you? Then you can request us to delete certain (or all) personal data about you. Whether we will delete data depends on the processing ground. We only delete data that we process on the basis of a legal obligation or for the performance of the agreement if the personal data is no longer necessary. If we process data based on our legitimate interest, we will only delete data if your interest outweighs ours. We will make this assessment. If we process the data on the basis of consent, we will only delete the data if you withdraw your consent. Have we accidentally processed data or does a specific law require that we delete data? Then we will delete the data. If the data is necessary for the settlement of a legal proceeding or a (legal) dispute, we will only delete the personal data after the end of the proceedings or the dispute.

If we grant your request, we will, to the extent reasonably possible, inform the parties to whom we provide information.

#### Restriction of processing

If you dispute the accuracy of personal data processed by us, if you believe that we have processed your personal data unlawfully, if we no longer need the data or if you have objected to the processing, you can also request us to restrict the processing of that personal data. For example, during the time that we need to assess your dispute or objection, or if it is already clear that there is no longer any legal ground for further processing of those personal data, but you still have an interest in us not deleting the personal data. If we limit the processing of your personal data at your request, we may still use that data for the settlement of legal proceedings or a (legal) dispute.

#### Right to data portability

At your request, we may transfer the data that we automatically process to execute the agreement or based on your consent, to you or another party designated by you. You can make such a request at reasonable intervals.

#### Automated individual decision making

We do not take decisions based solely on automated processing.

#### Right of restriction of processing and withdrawal of permission

If we process data on the grounds of a legitimate interest, you may object to the processing. If we process data on the basis of your consent, you may withdraw that consent. For more information, please refer to the relevant processing purposes above.

#### Exercising your rights

You can send a request for access, correction, deletion, data transfer of your personal data or request for withdrawal of your consent or objection to the processing of your personal data to [info@appcompleet.nl](mailto:info@appcompleet.nl).

To prevent abuse, we ask you to identify yourself adequately in the case of a written request for access, rectification or erasure. You can do this by sending a copy of a valid proof of identity. Do not forget to screen off your citizen service number and passport photo on the copy.

We strive to process your request, complaint or objection within a month. If it is not possible to make a decision within a month, we will inform you of the reasons for the delay and the time when the decision is expected to be made (no longer than 3 months after receipt).

#### Dutch Data Protection Authority

Do you have a complaint about our processing of your personal data? Please contact us. We are naturally happy to assist you. If we cannot come to a solution, you are also entitled to submit a complaint to the national privacy authority, in this case the Dutch Data Protection Authority. For this you can contact the Dutch Data Protection Authority via <https://autoriteitpersoonsgegevens.nl>.

## **7. Contact**

If you have questions, concerns or comments about this privacy statement or our data processing, please contact us via e-mail at [info@appcompleteet.nl](mailto:info@appcompleteet.nl).