

# Privacy Policy

DATE: 30.11.2021

**OneState™** (the “Game”) is provided to you by CHILLGAMING LTD, a private limited company incorporated under the laws of Republic of Cyprus, registered on April 21, 2020. Registered address: Elenis Loizidou 14, Office 201c, Strovolos 2042, Nicosia, Cyprus. E-mail: [lawyer@chillgaming.net](mailto:lawyer@chillgaming.net)

In this Policy, «CHILLGAMING», «CHILLGAMING LTD», «OUR» «US» «WE» means CHILLGAMING LTD.

We are the data controller of Personal data, which may include your name, e-mail address, game preferences and so on as described below. The data which does not allow us to identify is not considered as Personal data (e.g., anonymized data).

## **Personal Data we collect:**

### **Information you provide us:**

Nickname, E-mail address, information we import from your connected social media account, in order to set up your profile.

### **Information generated as part of the Game:**

- PlayerID;
- IP Address;
- Device Information;
- Registration Time;
- Login Time;
- Information about your game sessions;
- Interactions with Support team;
- Advertising ID (when you click the link that advertises the Game);
- Data from In-Game Chat;

You may also provide or generate information when you communicate with other users in the Game.

**PLEASE DO NOT SHARE ANY SENSITIVE INFORMATION ABOUT YOU WITH OTHER PLAYERS.**

## **CHILDREN:**

We believe that protection of children is a fundamental duty of the Game Industry. We do not allow Children under the age of 16 to access our Game. If you are a Parent and you believe that we unintentionally collected your children’s personal data, you may request the deletion of the information by contacting us on [lawyer@chillgaming.net](mailto:lawyer@chillgaming.net). We do not knowingly collect or store any personal information from children under the age of 16.

## How do we use your Personal Data:

<b>Data:</b>	<b>How do we use it:</b>	<b>Legal Basis:</b>
Nickname	We use this information to create your account for the Game in accordance with your request.	We need that to provide the Game as per EULA's terms.
Social Information (if you choose to log in via your social media account with these networks: Facebook, VK, Discord)	We use this information to: <ul style="list-style-type: none"> <li>- create your account for the Game in accordance with your request;</li> </ul>	We need that to provide the Game as per EULA's terms.
Gender (in case you provide this information)	We only receive this information if you voluntarily provide it. It is used in order to customise gameplay.	If it's necessary to provide the Game with gender-specific content in accordance with your request.
Date of Birth	We use your date of birth to verify your age if you are a user in certain regions. This is processed device-side only and is not transferred to us.	We need that to comply with legislation on Child Protection, Age Restrictions.
Region Location	We use this information to: <ul style="list-style-type: none"> <li>- verify your region location;</li> <li>- set up your gameplay on a regional server;</li> <li>- provide you with your geographic ranking; and</li> <li>- improve gameplay.</li> </ul>	We need that to provide the Game as per EULA's terms and to comply with legislation on personal data protection.
E-mail address	We only receive this information if you voluntarily provide it for the purposes of enabling login by e-mail. We use this information to send you	We need that to provide the Game as per EULA's terms.

	information on our game updates via e-mail.	
IP Address	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>- allow you to connect to the Game server; and</li> <li>- suggest your country/region when you seek to change your location setting.</li> </ul>	We need that to provide the Game as per EULA's terms.
<p>Device ID, Device Information</p> <p>(device model and manufacturer, RAM, ROM, CPU information, SoC device model, OS version and type.</p>	<p>We use this information:</p> <ul style="list-style-type: none"> <li>- to improve our services, including the functionality of the Game;</li> <li>- for security and verification purposes;</li> <li>- identify and address bugs and assess game function for optimisation; and</li> <li>- to combat users registering for multiple accounts.</li> </ul>	We need to establish the security of our services, manage registrations and improve our services
Advertising ID and select device information (Player ID, Device ID, IP address and engagement data and search terms)	If you click on a link that advertises the Game, we store the Advertising ID for that advertisement and select device information with your profile.	It is in our legitimate interests to use this information to monitor the success of our advertising and marketing programs.
User's Registration source.	If you found the Game on some source, whether it's an app or website, and set up your first in-game account, we would save, where exactly you've come from in order to analyze that and improve our ads campaigns.	It is in our legitimate interests to use this information to monitor the success of our advertising and marketing programs.

<p>Chat Data (audio and text, whether inside a battle (e.g. during actual gameplay) or outside a battle (e.g. in the game lobby)) and chat log data</p>	<p>If you enable chat services (audio and/or text) then we will process such data in order to deliver your messages to other users.</p>	<p>Necessary to perform our contract with you to provide the chat services in-Game.</p>
<p>Transaction Records (in-app): payments on Google Play or iOS App Store (Player ID, cost, product purchased, IP address, details of transactions linked to player ID, and device details including OS version, phone model, device root status).</p>	<p>We use this information to facilitate your payment and maintain a record of your transaction history.</p>	<p>We use this information to facilitate your payment and maintain a record of your transaction history.</p>
<p>Transaction Identifiers: unique identifier, name, e-mail address, phone number, country code, date of creation of account, number of transactions during different periods, number of top-ups during different periods, number of top-up receivers, number of chargebacks.</p>	<p>We use this information in order to detect fraud on the Game Services.</p>	<p>It is in our legitimate interest to ensure the security of transactions within our services.</p>
<p>Customer Support Ticket ID &amp; User Communications with Support: Name (optional), Player ID, device ID, application</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>- improve our services;</li> <li>- provide troubleshooting, such as addressing and</li> </ul>	<p>Necessary to perform our contract with you to provide and support the Game</p>

<p>version, battery level, WiFi strength, free space on device, network type, OS version, browser type, platform, carrier, country code, details of ticket, e-mail address (optional if in-app/in-Game support) and any information that you provide in communications with our support team. You also have the option of providing a photo to illustrate any errors</p>	<p>remediating technical issues and bugs.</p>	
<p>Reported Chat Data: Player ID and chat data</p>	<p>We use this information to identify abuse, harassment, plug-in sales or other uses of chat in violation of our End-user License Agreement and to consider restricting use of chat functions in those cases.</p>	<p>It is in our legitimate interest to ensure the integrity of the Game and protect users from prohibited conduct.</p>

## **How We Store and Share Your Personal Information**

Our Game is available worldwide, so we collect personal data from players from different countries. Our mission is to minimize the transfer of personal data from one region to another and ensure the players' data is secured in accordance with industry standards.

For example: our servers for the Game Services are located in:

<b>Region</b>	<b>Notes:</b>	<b>Data Processor</b>
Russia	for the players from the Russian Federation and other countries which belong to the Commonwealth of Independent States	Selectel Ltd.

In order to provide you with the Game Services, analyze our performance and grow, we seek assistance from different service providers who we can share some information about you with.

These service providers can be divided into the following groups:

- technical support providers (IT infrastructure assistance); software providers, SaaS providers - for the cases when these providers host necessary personal data on our behalf;
- professional advisers such as legal counsels, data privacy consultants and specialists, solicitors, accountants, tax advisors, auditors, insurance brokers;
- advertising, promotional agencies, online platforms carrying out marketing campaigns and analytics on our behalf and to advertising their own products or services that may be of interest to you.
- service providers that assist us in providing our services.

We may disclose information about you only with only those who are contractually obligated to keep your personal data confidential and will comply with the data protection laws.

We may also disclose your personal data as permitted by law in order to investigate, prevent or take action regarding illegal activities, suspected fraud, violation of our intellectual property rights, situations involving potential threats to the physical safety of any person, violation of our Terms and Conditions or other agreements, or as required by law.

## **CALIFORNIA PRIVACY RIGHTS.**

California laws provide residents of California specific rights such as:

- The right to access personal information we collect or share for business purposes. That concerns personal information in respect of the preceding 12 month period, including categories of information we have disclosed for business purposes in compliance with Privacy Policy and applicable laws.
- The right of deletion or “the right to be forgotten”. This means, we will delete your personal information.
- The right to non-discrimination. That means, you have the right to equal service and price even in case you invoked privacy rights.

If you are a resident of California we can provide access to your personal information or delete the same at your specific request twice every 12 month without a charge. Please note, in order to avoid unauthorized disclosures we shall proceed only in case of verifiable consumer request. It will be completed in 45 days, but in case of necessity we can extend this period by an additional 45 days. We shall notify you immediately in that case. You may send us an email at: [lawyer@chillgaming.net](mailto:lawyer@chillgaming.net)

## **EU/EEA - BASED PLAYERS PRIVACY**

If you are EEA-based user you have certain rights in connection with your personal information and how we handle it. Some of these rights may be subject to some exceptions or limitations. You can exercise these rights at any time by following the instructions below or sending us relevant requests to mail: [lawyer@chillgaming.net](mailto:lawyer@chillgaming.net)

Your rights include:

- Right to withdraw your consent in accordance with Art. 7 para. 3 GDPR (e.g. you may withdraw your consent to show personalized ads to you, by loading Terms & Privacy from your Game settings and following instructions in section Personalized Ads Consent Withdrawal in Privacy Policy (available to EEA-based users only))
- Right to access your data in accordance with Art. 15 GDPR
- Right to correct your data in accordance with Art. 16 GDPR (e.g. you can contact us if your email address has been changed and we should replace your old email address)
- Right to have your data deleted in accordance with Art. 17 GDPR
- Right to restrict processing of your personal information in accordance with Art. 18 GDPR (e.g. you can contact us if you want to restrict processing)
- Right to take your data with you in accordance with Art. 20 GDPR (e.g. you can contact us to receive your data if you want to upload it to another service)
- Right to object how your data is handled in accordance with Art. 21 GDPR (e.g. you can contact us if you do not agree with any user analytics procedures as described within this privacy policy)
- Right to send complaints to the supervisory authority in accordance with Art. 77 para. 1 f GDPR (e.g. you can contact the data protection supervisory authority directly).

## **DATA TRANSFER**

As mentioned before, in some cases we share your personal data with our affiliates and partners in the EU/EEA and outside the EU/EEA. We rely on safeguards referred to in Article 46 GDPR where the data transfer outside of EU/EEA is not covered by an EU Commission adequacy decision. Therefore, we use EU Commission-approved Standard Contractual Clauses which you can find [here](#).

## **UPDATES IN PRIVACY POLICY**

We will occasionally update this Privacy Policy as necessary to protect our users, furnish current information, and respond to legal and technical changes. The most current version of the Privacy Policy will govern our use of your information and will be available at