

## PRIVACY POLICY

### 1. Introduction

Privacy policy contains information regarding the usage of your personal data when visiting our websites, playing our games, applying for job vacancies, registering for newsletters or communicating with us for any other reason.

Data controller is Gamepires d.o.o. with registered office in Zagreb, Slavenska avenija 6a, PIN: 06567129625 (hereinafter: "Gamepires" or "us")

Personal data includes any data referring to identifiable physical person or other data which can be used to identify such person. Data we collect and process on you depend on the nature of our relationship and reasons of our communication.

If you have any questions regarding the manner in which your personal data is processed, contact us via email [info@gamepires.com](mailto:info@gamepires.com) or via post to address: Gamepires d.o.o., Slavenska avenija 6a, Zagreb.

### 2. Personal data we process

#### A) Data on job candidates

Gamepires as potential employer collects, processes and stores job candidates' data in the Gamepires data base based on the candidates' voluntary application via form on our website, via email or other way.

Gamepires processes data on job candidates based on their consent, and for the following purposes: in order to select candidates to be hired, in order to communicate with candidates regarding their job applications, related to establishing potential employment relationship, in order to comply with its legal obligations and for potential future employment of candidates that have not been selected.

As a general rule, data on job candidates are kept until the job application period completes, i.e. until selected candidates have entered into an employment agreement with us. Data on candidates that have not been selected as well as data on candidates who have sent open applications are kept for five years after the job opening has closed, i.e. after the job application has been received, exclusively based on their consent in order to be potentially employed by us in the future.

Gamepires collects the following data on job candidates:

- Identification data (name and last name);
- Contact data (e-mail, phone number, address);
- Educational data and work experience data (résumé, proof of education and work experience);
- Other data that the candidate provides voluntarily in its application, during the interview or in other way (e.g. date and place of birth, PIN, etc.).

As a general rule, we do not collect special categories of job candidates personal data. However, a job candidate might submit a piece of personal data that enter into the special category of personal data, e.g. a photo, information on disability, and similar.

Processing of identification data, contact data, educational and work experience data is necessary in order for Gamepires to be able to communicate with the candidate, inform the candidate on the status

of its job application, invite them to a job interview, evaluate whether they comply with all requirements for the work position and, finally, to enter into an employment agreement with the selected candidate.

In extraordinary circumstances, some personal data might be processed based on the law, in order to comply with regulatory requirements, which might include special categories of personal data, for example, in order to ensure no discrimination is taking place, to give precedence to certain persons in the employment process. Gamepires might be legally obligated to submit candidate personal data to governmental authorities.

Gamepires most often collects personal data directly from the job candidate. However, occasionally Gamepires might collect such data from third persons (e.g. employment agencies, Croatian Employment Services or similar) or from publicly available sources.

#### B) Data on newsletter subscribers

Visitors wishing to do so may subscribe to a newsletter via our website [www.scumgame.com](http://www.scumgame.com) by entering their email address in the form available on our website. The newsletter is sent via email based on your consent granted to us by compiling and confirming the form on our website.

You have the right to withdraw your consent at any time without any charge, i.e. to unsubscribe from receiving our newsletters by clicking on the link “Unsubscribe” which can be found at the bottom of each mail containing newsletter you receive. In this case, you will no longer receive our newsletter and your email address will be removed from our database.

The purpose of this processing is to deliver news on the game to interested persons. The only personal data we process in doing this is your email address which we will keep until you withdraw your consent. Your email address will be delivered to our business partners that we have engaged for sending newsletters on our behalf.

#### C) Data on players

##### Game integrity

In the event a player playing our video game via any internet platform or service acts in a prohibited or inappropriate manner, the relevant platform or service may deliver certain data on this player in order to prevent the player from further breaching rules of the game and to protect other players. For example, such processing might take place when certain players treat other players in an inappropriate manner, uses aggressive or offensive language when communicating with other players, cheats, etc.

In such case, the relevant platform or service collecting users’ personal data will deliver the following data on the player breaching the rules: nickname, ID code, description of the breach and the hardware hash. The nickname and ID code are required in order to disable further access to the game to a certain player, the description of the breach in order to establish whether the player has made a breach of such a severity that makes it justifiable to prevent future access to the game to this player, whereas we require hardware hash in order to prevent the player to access the game via other user account despite the ban.

We process the said data based on the agreement on usage of software entered into between the player and Gamepires when downloading the game ("End User Licence Agreement"), in order to improve our services and protect other players and we keep the data for as long as necessary to achieve this purpose, but no longer than five years after receiving the notice on the breach.

#### Data Analytics

We collect the types of personal data listed below for the purposes of data analytics to improve our website, products and services, marketing, customer relationships and experiences:

- **Technical Data** (known as online identifiers and including internet protocol (IP) address, unique mobile device identification numbers (such as your Media Access Control (MAC) address, Identifier For Advertising (IDFA), and/or International Mobile Equipment Identity (IMEI), type of device, your login data, browser type and version, time zone setting and geolocation, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the website and our products and services).
- **Usage Data** (including information about how you use our website, products and services).
- **Marketing and Communications** (including your preferences in receiving marketing from us and our third parties and your communications preference).
- **Profile Data** (including your username and password, interest, preferences, correspondence, feedback and survey responses).

We will process these types of personal data on the basis of:

- **Explicit Consent** where any cookies, beacon technology or similar software are used; or
- **Our Legitimate Interests** in other cases such interests include defining types of customers for our products and services, to keep our website, product and services updated, to develop our business and to inform our marketing strategy).

#### D) Data on website visitors

You can find information on the processing of personal data of our website visitors hereinafter, in item 3 of this Privacy Policy, under section "Cookies".

### **3. Cookies**

Our website collects cookies containing certain information regarding the manner you use our website. Cookies are a short textual record containing a unique identification and reference code which the web browser stores on your device and through which we are able to recognize you again when you access our website.

Gamepires uses the following cookies:

- **Necessary cookies** – necessary for the functioning of the website and cannot be disabled in our systems. They are customarily set as response to your actions which include request for services, such as cookie settings, registration or compiling of forms. You can set up your web browser so that it blocks those cookies or sends warnings on them; however, if you do so, certain parts of the website will not function. Those cookies do not store any information which might be used to identify you and their usage does not require your consent.

- Functional cookies – enable website to provide enhanced functionalities and personalisation based on your preferences and settings. These can be set up by us or by third party services providers whose services have been added to our webpages. We process data based on these cookies only with your consent; however, if you disable them, some of website functions might not work properly.
- Statistical cookies – enable registering visits and source of traffic for the purposes of measurements and enhancing efficiency of website. If you disable these cookies, we will not know when you last visited our website, and we will not be able to track its efficiency. These cookies do not store personal data directly but are based on the unique identification of your browser and internet device. We process this data only with your consent.
- Marketing cookies – serve to track visitors through webpages and to display targeted ads. They are used to track success of marketing communication initiatives and for advertising purposes. They collect data on the behaviour and navigation on website in order to adjust targeted ads. Data from these cookies are processed only with your consent, and if you do not enable these cookies, you will have untargeted advertising.

Some cookies we collect last only for the time of your usage of our website, whereas others last longer, in order for us to be able to recognize you once you access our website again.

Persistent cookies – persistent cookies remain on your computer after you close your internet browser. The websites use these cookies to store data such as registration name and password, language settings or cookie settings so that you do not need to enter these again every time you visit.

Session cookies – session cookies are removed from your computer once you close the internet browser. The websites use them to temporarily store data such as last couple of pages you have opened on the website you are visiting.

Some data collected through cookies might be shared with our partners in order to enable them to conduct research on visitor behaviour.

To find out more about cookies, visit page [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). Gamepires uses Google Analytics with your consent. To disable tracking through Google Analytics on all websites, visit <http://tools.google.com/dlpage/gaoptout>. You can manage user options in the cookie browser.

#### **4. Recipient of personal data**

Your personal data is not shared with third persons for the purpose of advertising their services. We will not sell your personal data to third persons.

We will share your personal data with other recipients when necessary to fulfil our legal obligations (i.e. we will send data to competent national authorities), in cases where you have agreed to share your personal data with a third party (e.g. in case of use of cookies), and with the IT service providers with whom we have entered into appropriate data processing agreements and whose systems we use in our business operations.

In the event of a future merger or acquisition of Gamepires, we can share your personal data with new shareholders, and certain personal data may also be transferred during the sale process, to potential buyers and their advisors, within the due diligence procedure.

#### **5. Jagex Limited as a Publisher**

For our games (including SCUM), Jagex Limited ("Jagex"), our parent entity, undertakes a number of data processing activities in its role as a game publisher. For these activities, Gamepires and Jagex act as two separate controllers. You are advised to read Jagex's privacy policy available at this link: <https://www.jagex.com/en-GB/terms/privacy>.

#### **6. Transfer of data to third countries**

We might sometimes transfer your personal data to countries outside the European Economic Area (EEA), but only if the means of transfer ensure an appropriate level of security of your data, for example: on the basis of a decision of the European Commission establishing that the legislation of that country provides an adequate level of data protection; under the Data Transfer Agreement concluded with a third party; or if you specifically agreed to transfer the data (e.g. in the case of cookies).

When transferring your data outside the EEA in cases where the country to which the data is transferred does not ensure an appropriate level of data protection, we will take all reasonable steps to ensure that your data is handled safely and in accordance with this privacy policy.

#### **7. Period during which your personal data is stored**

We store your data as long as necessary in accordance with the purpose for which they are collected. After the storing period expires, we will delete the data, and in cases where this is technically not possible, we will make the data illegible. If we still need certain data for legitimate business purposes after the time limit for storing the data has expired, we will take appropriate steps to anonymize the data.

We keep data based on our legitimate interests in accordance with justified and reasonable business needs.

We keep the data we collect on the basis of consent until the consent is withdrawn.

#### **8. Your rights**

- The right of access to personal data. You have the right to access your personal data at any time, by sending a request requesting that we provide you with all your personal data that we are processing.
- The right to amend or delete personal data. You have the right to request that your personal data be updated, amended and supplemented at any time. You have the right to request that your personal data be deleted whereas we can comply with this request if we do not have a legal obligation or other legal basis for keeping certain data.
- Restriction of processing. You have the right to object to certain processing activities, for example if we process your personal data based on legitimate interest.
- The right to transfer data. You have the right to request that all your personal data that we are processing be delivered to you or directly to another company.
- The right to withdraw consent. If we process your personal data based on consent, you can withdraw your consent at any time without explanation and without compensation. We will stop processing personal data collected under this legal basis without delay, but the withdrawal of consent does not affect the legality of the consent-based processing before the consent is withdrawn.
- Right to object to a supervisory authority. You have the right to file a complaint with the competent supervisory authority for data protection: Croatian Personal Data Protection Agency, Selska ulica 136, 10000 Zagreb, T: +385 (01) 4609-000, e-mail: [azop@azop.hr](mailto:azop@azop.hr), web: [www.azop.hr](http://www.azop.hr)

Our products and services are intended for use by persons who are at least 16 years old. If a child under 16 wishes to use services for which we process personal data, the child needs parental consent or approval. If you consider that a child under 16 years of age is using (without parental approval) the services in relation to which we process personal data, please inform us by sending e-mail to: [info@gamepires.com](mailto:info@gamepires.com).

All requests can be sent by a written request to the business address Gamepires d.o.o., Slavenska Avenija 6a, Zagreb or by sending e-mail to: [info@gamepires.com](mailto:info@gamepires.com).