

RoboHero PRIVACY POLICY

You can disable some cookies, with information that can be used for marketing purposes: connection of trackers for analytics systems, and partners data. The tools that are important for the operation of the site and related systems will not be deactivated. You should be aware, however, that disabling certain cookies will affect the quality of your experience with the RoboHero site and its services.

Discover more about our cookie policy here: <https://robohero.io/assets/bt-cookies>

Last revised and effective: 18 December 2022

IMPORTANT NOTICE: PLEASE READ THIS DOCUMENT CAREFULLY BEFORE ACCEPTING, AND MAKE SURE YOU HAVE REACHED THE AGE OF 16 OR WHICHEVER OTHER AGE MAY BE REQUIRED TO ACCEPT THIS POLICY IN ACCORDANCE WITH THE LAWS OF YOUR COUNTRY OF RESIDENCE. YOU CAN FIND OUT MORE DETAILS ABOUT PERMISSIBLE AGE IN SECTION 12 BELOW. ENGLISH VERSION OF THIS POLICY IS THE ONLY ORIGINAL VERSION AND SHALL PREVAIL IN THE EVENT OF ANY DIFFERENCES, QUESTIONS OR DISPUTES CONCERNING THE MEANING, FORM, VALIDITY OR INTERPRETATION THEREOF.

This Privacy Policy constitutes an integral part of the Terms and Conditions as defined in Terms of Service current version of which available at:

<https://robohero.io/assets/bt-terms> - and explains the details of processing the personal information (“data”) about you as a user of our services (“services”, “RoboHero services” or “our services”, taking into consideration the context), including:

- Mobile games being distributed by RoboHero directly (explicitly excluding, for avoidance of doubt, distribution via any third-party gaming platforms such as,

Nintendo, Google Play Store, Apple App Store, Nintendo Game Store and etc.);

- Any other RoboHero services provided under the Terms and Conditions (computer and mobile applications, websites, forums, online store, marketplace, any support services, including RoboHero Support Service, and etc.) –

and/or as a registrar and consequent holder of a user account within our services which is unified for all RoboHero services (“RoboHero Account”).

IN SHORT: in order to provide you with our services, we need to collect and then process some of your data which we define below. We also need do share some of such data with our partners and other third parties in order to make it possible. We will not disclose any of your data otherwise than provided by this Privacy Policy. We ensure security of your data while processed by us. By accepting this Privacy Policy, you give us your explicit consent to process your data in accordance with the rules of this document.

This Privacy Policy is split in the following sections for your comfort:

1. WE AS DATA CONTROLLER
2. WHAT DATA WE PROCESS
3. FOR WHAT PURPOSE WE PROCESS YOUR DATA
4. HOW LONG WE STORE YOUR DATA
5. WITH WHOM WE SHARE YOUR DATA
6. WHAT ARE YOUR DATA PROCESSING RIGHTS
7. WHAT ARE YOUR DIRECT MARKETING RIGHTS
8. WHAT IS OPT-OUT OPPORTUNITY
9. HOW AUTOMATED DECISION-MAKING APPLIES TO YOU
10. HOW WE SECURE YOUR DATA
11. HOW TO WITHDRAW YOUR CONSENT
12. HOW WE TREAT CHILDREN’S DATA
13. HOW WE PROCESS YOUR COOKIES
14. HOW WE UPDATE THIS PRIVACY POLICY

15. HOW TO CONTACT US

This Privacy Policy does not apply to any personal data collected from job applicants.

1. WE AS DATA CONTROLLER

We process your data according to the terms and conditions of this Privacy Policy as data controller.

The term “data controller” refers to the legal entity which determines the purposes and means of the processing of your data.

Data controller: one of the following legal entities (depending on the circumstances described right below):

- When services are provided directly to the user (e.g. via our web-sites):
DevDream House OÜ, with its registered address at Harju maakond, Tallinn, Lasnamäe linnaosa, Lõõtsa tn 5, 11415
- When services are provided via third-party platforms (e.g. GameSwift, Nintendo, Google Play Store, Apple App Store): DevDream House OÜ Harju maakond, Tallinn, Lasnamäe linnaosa, Lõõtsa tn 5, 11415.

Email: hello@robohero.io

In this Privacy Policy “data controller”, “RoboHero”, “we” or “our” mean the same subject.

2. WHAT DATA WE PROCESS

2.1. The data below may be provided by different sources, including you (whether intentionally or automatically through the use of our services), our affiliates on our request, and our partners (as described in Section 5 below), or may be generated by us on the basis of the aforementioned data.

2.2. Under the terms and conditions of this Privacy Policy we process the following types of data about you which are accompanied with examples of such data (sample data for reference) and primary sources of such data (source):

	Type of data	Sample data for reference	Source
1.	Personality data	Nickname, age (mostly age range), gender and other data about your person we may be provided by you (at your own discretion) or our partners provided they have a valid lawful basis for that (e.g. your consent)	You (intentionally), our affiliates and partners
2.	Identity data	Real name, date of birth, age, gender, ID, Tax/VAT number, scan of ID, passport or another identifying document, tax certificate or any document issued by state authorities, photo or video recording with you, clothing size and other data about your identity as an individual which may be necessary for a particular purpose designated herein	You (intentionally)
3.	Contact data	Contact e-mail, recovery e-mail, mobile phone number, residential address, shipping address, social network ID, parent or legal	You (intentionally), our affiliates

		guardian/representative contact details	
4.	Localization data	IP address and related geolocation data (city and country), language preferences	You (both intentionally or automatically), our affiliates and partners
5.	Account data	Your User ID (which is generated by us), login name, password (for verifying you while signing-in), nickname, avatar (profile photo), e-mail, registration date and time, our games you play, list of your purchases, gifts, balance, any other data you may leave within your RoboHero Account	You (both intentionally or automatically), our affiliates and partners
6.	User generated content (UGC) data	Any data submitted in forums, messages, chats, etc. by the user of their own choice, other than Submissions data. Depending on the services and place of posting (chat room or forum), this information can be available to some or all other users of our services	You (both intentionally or automatically)

<p>7. Data regarding your requests or other submissions to us (“Submissions data”)</p>	<p>Your feedback, comments, answers to questionnaires, opinions and other submissions with regard to our services form of texts, screenshots, audio or video recordings</p>	<p>You (intentionally)</p>
<p>8. Data about your behavioral actions when using our services (“Behavioral data”)</p>	<p>Information about the way you use our services, its frequency and etc. (e.g. log-ins, services segments used, page views, transactions made within our services) other than Browsing data and Gameplay data</p>	<p>You (automatically), our affiliates and partners, or generated by us</p>
<p>9. Data about your browsing behavior and your identity on the Internet (“Browsing data”)</p>	<p>Cookie files (more details are available in our Cookies Policy), Your IP address, name of your browser, name of your Internet provider, traffic source (including the source from which our games or apps were installed on your device)</p>	<p>You (automatically), our affiliates and partners, or generated by us</p>

10.	Gameplay data	Any data about your in-game actions in tangible (including electronic) form, data about your in-game interactions with other players, duration of your gaming sessions, data about choices made within gameplay	You (automatically) our affiliates, or generated by us
11.	Game data	Game version, installation date and time, graphics, audio and other game settings, game achievements, progress and inventory, other in-game results, last launch date and time and etc.	You (automatically), our affiliates
12.	Data about your device(s) (“Device data”)	Device ID, MAC address, location data (city and country), language settings, time zone and localization settings, device manufacturer and model, operating system, installed applications, phone network operator, network type and connection, Internet connection speed, screen resolution and orientation, device hardware characteristics (CPU, GPU, RAM and ROM size, battery etc.) and other software and hardware information about your device	You (automatically), our affiliates and partners

13.	Customer service data	Case details, case history, complaint history, customer service chat logs, penalties history, any submitted files and information	You (intentionally), our affiliates
14.	Purchase data	Name and cost of purchased in-game items, total cost of purchased in-game items, total amount of spent, amount in-game currency you possess or spent	You (automatically), our affiliates and partners
15.	Third-party services data (e.g. Google Play Account, Nintendo, Apple App Store)	Nickname (on third party platform), User ID, including social network IDs and application store IDs, e-mail, any types of identifier for advertisers (IDFA, such as Apple IDFA and Google AAID) and other data necessary for your registering in our services via your social or application store accounts and/or connecting your social account to our services/RoboHero Account (e.g. Facebook, Twitter)	You (automatically), our affiliates and partners

16.	Analytical data	Any information derived from the data mentioned in this table (except identity data) used for analytics, including retrieving in-game, marketing, advertising or other statistics	Generated by us
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2.3. In case we need to process another data about you, we will request a separate approval for such data processing from you.

2.4. Please note that we DO NOT INTENTIONALLY process any special categories of personal data (including any information about your health, race, religion, political views, etc.). We kindly recommend you remain cautious when sharing this data about yourself when using our services, in game chats, on the websites (forums, commentaries, etc.) and otherwise on the Internet.

3. FOR WHAT PURPOSE WE PROCESS YOUR DATA

3.1. We process your data as we aim at providing you our services in the best possible manner and the highest level of service, efficiency and your convenience, and, in some cases, to make the mere provision of such services possible, including from the technical prospective. The data processed by RoboHero according to this Privacy Policy can only be used for the following purposes (processing purpose) which are accompanied with the examples of particular situations when your data is being used (purpose examples), the data used for such purposes (data processed) and lawful basis for processing such data for respective purpose (lawful basis for processing):

	Processing purpose	Purpose examples	Data processed	Lawful basis for processing
1.	Providing the basic services under the Terms and Conditions	Operating and supporting our services Creating user profiles, maintain the users database Enabling you to communicate with other players in chats and on forums	Personality data Localization data Account data UGC data Behavioral data Browsing data Device data Game data Gameplay data Purchase data	Contract performance Consent (additionally)

		Analytical data	
		Third-party services data	
		Personality data	
		Localization data	
		Account data	
		UGC data	
		Submissions data	
		Behavioral data	
		Browsing data	
2.	Personalizing our services for you	Device data	Consent
	Storing your preferences and settings	Game data	
		Gameplay data	
		Customer service data	
		Purchase data	
		Analytical data	
		Third-party services data	

	Verifying your logging-in		
	Verifying your will to make a purchase within our service	Identity data	Contract performance
3.	Verifying your identity and your will	Contact data	Legitimate interest
	Verifying your will to commit other actions within our service	Third-party services data	Consent (additionally)

	Enhancing our games and other services, creating and developing new ones		
	Linking your RoboHero Account to your third-party accounts (including Apple App Store, Google Play Store, Nintendo)	Any data excepting:	
4.	Enhancing our services and your user experience	<ul style="list-style-type: none"> ● Identity data ● Contact data 	Consent

	Bugs fixing and other troubleshooting		
	Conducting services-related business optimizations		
	Receiving and responding your inquiries and requests		
	Fulfilling your inquiries and requests with regard to our services		
5.	Organizing the work of customer support service	Any data required for response to user's request	Contract performance Consent (additionally)
	Providing you with other support services in connection with our services		
	Maintaining proper functioning of our customer support service		

6.	<p>Creating and utilizing analytics on our services and audience</p>	<p>Analyzing your activity while using our services (e.g. web-sites)</p> <p>Improving our services</p> <p>according to the analytics collected</p> <p>Utilizing the analytics collected for commercial promotion of our services and other advertisement/marketing purposes</p>	<p>Any data excepting:</p> <ul style="list-style-type: none"> ● Identity data ● Contact data 	<p>Consent</p>
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	Communicating users about discounts and promotions with respect to the services		
	Serving advertisement relevant to you	Personality data	
	Conducting quizzes, contests, competitions, awards and other promo events	Localization data	
		Account data	
		Behavioral data	
		Browsing data	
7.	Conducting advertising and marketing activity	Device data	Consent
		Gameplay data	
		Purchase data	
		Analytical data	
		Third-party services data	
	Sending newsletters (including about patches and updates, news, forthcoming releases, special promotions and competitions, and other events directly related to our services) and marketing		

materials to you
relating to our
services

Informing you
about our offers
(discounts,
in-game offers
and other
relating to our
services) which
may be
interesting
specially for you

Conducting our
own advertising
campaign of
RoboHero
products or
services, using
the data for other
internal
marketing
purposes (or
other marketing
purposes related
to the services)

8.	Securing your user experience	Fighting frauds (such as cheating, tampering, unauthorized transactions and other unfair methods of play), including by means of players behavior analyses, banning players and taking any necessary precautions measures	Personality data Account data UGC data Submissions data Behavioral data Device data Game data Gameplay data Customer service data Third-party services data	Consent Legitimate interest (additionally)
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			Personality data	
			Localization data	
			Account data	
		Organizing	Behavioral data	
		questionnaires	Browsing data	
		with regard to	Device data	Consent
9.	Conduct	our services	Game data	
	surveys and	Receiving	Gameplay data	
	research	feedbacks from	Purchase data	
		you	Analytical data	
			Third-party services	
			data	

		Verifying and confirming your payments		
		Sending you respective invoices	Personality data	
10	Enabling purchase opportunities within our services	Transferring funds (e.g. purchased in-game items) to your RoboHero Account	Identity data Contact data Account data Purchase data Third-party services data	Contract performance Consent (additionally)

11.	Providing security of our services and integrity of our business	Preventing (and fighting) violations of the Terms and Conditions Preventing infringement of our intellectual property and other rights	Any data	Legitimate interest
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12	Compliance with our legal obligations imposed by applicable laws	Compliance with any applicable privacy laws and regulations (GDPR, COPPA and etc.), tax or accounting rules, know-your-customer, anti-laundering and other laws RoboHero have an obligation to comply with	Any data	Legal obligation
13	Contacting you on other matters	Contacting you with regard our services on the matters described in this table earlier	Any data	Contract performance Legitimate interest Consent (additionally)

For your convenience we explained the meaning of each lawful basis used in the table above:

- Consent - your data is processed after receiving from you a freely given, specific, informed and unambiguous consent for that. To ensure security of your privacy laws rights, we may additionally request your consent for processing your data on other lawful basis (e.g. contract performance or legitimate interest), however, we also draw your attention that the withdrawal of such consent does not preclude us to process your data if such processing

is permitted by applicable law on the other basis (including those mentioned right below).

- Contract performance - your data is processed when necessary to perform a contract with you, such as the Terms and Conditions, or to take necessary steps for contracting you if you request that.
- Legal obligation - your data is processed when (and in the manner) required by applicable laws.
- Legitimate Interest - your data is processed in order to comply with our legitimate interests (such as preventing violations of our intellectual property and other rights), or legitimate interest of other party (including you), when these interests outweigh your own rights and interests.

3.2. In case we need to process your data for another purposes, we will request a separate approval for such purposes from you.

3.3. We specifically draw your attention that RoboHero may also use your data for creating anonymized databases (including any compilations, lookalike models and etc.) which will be further utilized by us (or any third party upon our authorization) for any purpose, including our internal ones. We guarantee such databases will not contain any data which could be used for identifying you (personal identifiable information), despite the fact such data will be derived from your personal data and the data of other users. Likewise, we can also use your data in anonymized form, e.g. by the compilation other than described above, in the way it does not constitute your personal data after anonymizing/compiling. Before anonymizing, your data is used strictly as set forth in this Privacy Policy.

4. HOW LONG WE STORE YOUR DATA

4.1. We retain any of your personal data which we collect for as long as your RoboHero Account is active according to the Terms and Conditions, and/or for as long as it is necessary to provide you with the services, and while we have a valid lawful basis for processing your data. We also erase your personal data after reaching the purposes for which we collected such data.

4.2. Please consider that we have the right to continue to retain some of your user data even after complying with your request to delete such data in the following cases:

- We have the lawful basis to further process your data other than a consent from you. As instance, we may be required to do so in order to comply with applicable laws (as instance, for tax or accounting reasons, know-your-customer, anti-laundering or other legal requirements and obligations);
- Your user data has been anonymized in the way it cannot be used for identifying you, and therefore is no longer your personal identifiable data.

5. WITH WHOM WE SHARE YOUR DATA

5.1. For the purposes of processing your data under this Privacy Policy RoboHero may share your data with third parties. In order to make you know about your data flow and possible transfers, we prepared the following table where we have described which categories of recipient we usually transfer your data to (category of recipient), which our main partners, as an example, comprise such categories or which our counterparts may be qualified for such categories (partner examples or explanation), for which purpose, as defined in Section 3, we share your data with such third parties (share purpose) and which lawful basis, as defined in Section 3, we invoke for the transfer (lawful basis for transfer):

Category of recipient	Partner examples or explanation	Share purpose	Lawful basis for transfer
1.	Analytics partners	Google Analytics, Yandex Metrics	Consent
		Creating and utilizing analytics on our services and audience	
		Conducting advertising and marketing activity	
		Conduct surveys and research	
		Personalizing our services for you	
		Enhancing our services and your user experience	
		Traffic analysis	
2.	Tracking, analytics and statistics partners	CloudFlare, Facebook, Amazon AWS	Consent

3.	Advertising partners	WeMakelt	Conducting advertising and marketing activity Personalizing our services for you	Consent
4.	Operating partners	Amazon AWS	Providing the basic services under the Terms and Conditions (as instance, Amazon Web Services are used, among others, for hosting our servers)	Consent
6.	Two Factor Authentication services	Google Authenticator	Verifying your identity and your will	Consent

8.	Assignees	Any assignee of our rights and obligations under the Terms and Conditions	Any purpose	Legitimate interest Consent (additionally)
9.	Auditors and other examination organizations	Any entity conducting audit or other legal/financial check of RoboHero	Compliance with our legal obligations imposed by applicable laws (in certain cases provided by law)	Legitimate interest Legal obligation (in certain cases provided by law) Consent (additionally)
10	Our affiliates	Any legal entity affiliated to RoboHero	Any purpose, mainly: <ul style="list-style-type: none"> • Providing the basic services under the Terms and Conditions • Organizing the work of customer 	Legitimate interest Consent (additionally)

support
service

11.	Government, regulatory, judicial, enforcement or other state authorities	Data protection authority, governmental trade commission, police, court, bailiffs and etc.	Compliance with our legal obligations imposed by applicable laws	Legal obligation
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5.2. As a rule, we do not share your data with anyone other than specified in the table above, and we ensure the confidentiality of your data. However, in some cases we may be obliged to provide other third parties with your data if such obligation is imposed on us by applicable law.

Processing your data by our partners

5.3. Usually our partners determine the principles and purposes of user data processing by themselves. It means that the processing of your data by them is not covered by this Privacy Policy and is done in accordance with rules imposed by such partners.

5.4. For your convenience we prepared the list of our main partners to whom we usually disclose user data and the list of their respective privacy policies. Please note that this list is not exhaustive and does not cover all our partners (only main ones), and some of the policies below may be not applicable to your region, please make sure that the privacy policy you read applies to your country of residence):

Partner	Privacy Policy available at
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Google	https://policies.google.com/privacy?hl=en-US
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Facebook <https://www.facebook.com/policy.php>

Amazon AWS <https://aws.amazon.com/privacy>

CloudFlare <https://www.cloudflare.com/privacypolicy>

Yandex Metrica <https://metrica.yandex.com/about/info/privacy-policy>

5.5. Despite we indicate the payment data as to be processed by us, for your better understanding the data amount we process about you, we DO NOT anyhow save or store your payment data at any period of time. Such data is de facto collected and further processed by our payment partners; we only provide them with the technical opportunities to do so through within our services. As such partners commonly do not have any general privacy policy unified for all regions, we recommend you to access and read out the relevant documents while making a payment via their platforms (e.g. after you have been redirected by our services to the website of a relevant platform when initiated the payment procedure).

5.6. We may share your user data with any competent law enforcement body, or regulatory or government agency, or with the courts for the purposes of compliance with applicable legislation, or in response to an official and legal request.

5.7. In the future, we may enter into contracts with other partners. If this is the case then we will make every reasonable effort to update the list of our partners (as well as the links to partners' privacy policies in clause 5.4) which is provided in this Privacy Policy in a timely manner, but in any way no later than once every six months, or more often in the event of a significant change in our data processing practices.

Transferring your data abroad

5.8. We operate all over the world, and therefore we may transfer your data to our counterparties (partners, affiliates and etc.) in different countries, including those which are located outside the European Economic Area (EEA). We do all our efforts,

including those imposed on us by applicable law, to ensure an adequate level of personal data protection in each case, HOWEVER, we would like you to consider that the countries to which we transfer your data may not have the same data protection laws as your jurisdiction.

5.9. We take all reasonable steps to ensure the confidentiality of your personal data when it is transferred abroad, including to the countries which are located outside the European Economic Area. We will also take reasonable steps to assure that third parties to whom we transfer any personal information will provide sufficient protection of your data. In particular, RoboHero undertakes reasonable physical, technical and administrative security measures to ensure your data is adequately protected, including when it is transferred to countries which are located outside the European Union or European Economic Area: such measures include (without limitation) executing standard contractual clauses which have been adopted by the European Commission, when transferring your data to the third parties located outside the European Economic Area.

Your data and other users

5.10. Please note that other users of our services may see some of your data we process. For example, other users are able to see your nickname and avatar (profile photo) and the data of your linked accounts (including Google Play Store, Apple App Store, Nintendo accounts). They can also see any content you post publicly within our services (public messages on forums, attached files and etc.), or some of your game results (data of in-game ratings or leaderboards) and achievements.

6. WHAT ARE YOUR DATA PROCESSING RIGHTS

6.1. Taking into consideration the differences in data protection laws which may be applicable to you by virtue of your citizenship, residence and other factors, usually data protection laws (such as GDPR) grant the data subject (you) the following data protection right which are applicable to this Privacy Policy and your data processing by RoboHero as well:

Your right	Right explanation
1. Right to access	You have the right to request the copy of your data processed by RoboHero
2. Right to rectification	You have the right to request that we correct any information you believe is inaccurate, incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing
3. Right to restrict processing	You have the right to restrict the use of your data in certain circumstances entirely or in part where possible, unless we have an opposite obligation required by applicable law
4. Right to erasure (“right to be forgotten”)	You can request RoboHero to erase any of your data unless we have an opposite obligation required by applicable law

5.	Right to portability	You have the right to receive your data in a structured, commonly used and machine-readable format or to request RoboHero to directly transmit those data to a third party where technical possible and reasonable
6.	Right to object to processing	You have the right to object to the processing of your personal data
7.	Other rights	You may have other rights in accordance with this Privacy Policy and applicable laws

How to exercises your data protection rights:

6.2. In order to exercise your data processing rights stated in clauses 1-5 of the table above, you should send us a request via our support service:

hello@robohero.io, and follow the instructions provided or send us such a request directly through your RoboHero Account settings (where available). Other requests concerning your data processing rights can be sent to hello@robohero.io.

6.3. Please note that in some cases, in order to comply with a request, we may ask you to provide us with some additional information where this is necessary to identify you as our user. We undertake to comply with your request free of additional charge within one month of receipt, but in some cases this period may be extended by a further two months. We have the right to refuse to comply with your request or charge a reasonable fee if your request is manifestly unfounded or excessive.

6.4. Please note that complying with your request to restrict processing or to erase your personal data may result in the deletion of your RoboHero Account (including all game results, and any game progress which is associated with your RoboHero Account which will be may be irretrievably lost), so please consider this when deciding to exercise these personal data rights.

6.5. Please also note that uninstalling our game (or any application related to our services) from your device does not automatically result in the erasure of your personal data from our servers.

6.6. We would like to draw your attention on the fact that some of the aforementioned rights may have some limitations in terms of their exercising due to obligations imposed on RoboHero by applicable laws. As instance, in some cases we have to archive your data and continue to store it for a certain period of time (which depends on the requirements set forth by applicable law) even after you requested full erasure of such data.

How to protect your data processing rights:

6.7. As a rule, each country (as instance member-states of European Union) provides at least one independent public authority (supervisory authority) which is responsible for enforcing local data protection laws and protecting personal data rights of natural persons. If you believe RoboHero violates your data protection rights, you may lodge a complaint with a supervisory authority, in particular in the country of your habitual residence, place of work or place where the violation occurred. However, we would like to encourage you to contact RoboHero first, so we could promptly review your complaint, eliminate the violation, if any, and restore your rights. In such case please let us know at: hello@robohero.io

7. WHAT ARE YOUR DIRECT MARKETING RIGHTS

7.1. As RoboHero has the right to send you direct marketing messages or e-mails (as we described in clause 3.1.7 of this document), we additionally draw your attention that you have the right to unsubscribe from each of such mailings by exercising your opt-out rights as specified in the Section 8 of this Privacy Policy below.

7.2. Please note that your refusal to receive direct marketing messages from us does not affect our right to send you other messages, emails or otherwise contact you as allowed by virtue of this Privacy Policy.

8. WHAT IS OPT-OUT OPPORTUNITY

8.1. If you wish to opt-out the processing of your data with regard to certain purposes, including the purposes of direct marketing, you should send us a request via our support service: hello@robohero.io. However, we would like you to consider that opting-out certain processing purposes may lead to impossibility of providing you our certain (or even all) services in part (or at all). We will take our best efforts to minimize such services limitations.

8.2. Please take into consideration that the opt-out opportunity applies only to the processing of your data based on your consent, unless otherwise is explicitly stated by the applicable law. We still have the right to process your data based on the other lawful basis such as contract performance, legitimate interest or legal obligation, if available by virtue of applicable law, even if you have opted out such processing according to the provisions of this Privacy Policy section, however, in this case you are still able to exercise your right to object, as described in Section 6 above, at any time.

Opt-out opportunities for California and Nevada residents

8.3. Despite RoboHero did not sell (but could share in accordance with Section 5 above) your data in the last 12 months, we would like to inform you that both California and Nevada state grant its residents the following opt-out rights:

8.3.1. California residents using our services have the right to opt out the disclosure of their personal data to third parties for direct marketing purposes. If you would like to exercise this right you should contacting us at: hello@robohero.io.

8.3.2. Nevada residents using our Services have the right to opt out the sale of covered information for monetary consideration. "Sale" and "covered information" shall be defined according to Nevada laws. For the purposes of your convenience, we inform you that on the effective date of this Privacy Policy the "Covered information" includes your first name, last name, address, email address, phone number and any identifiers allowing a to contact you by means of physical

communication or online. If you would like to exercise this right you should contacting us at: hello@robohero.io

8.4. For a list of the categories of personal data we have shared for commercial purposes during the last 12 months, please contact us at: hello@robohero.io.

Push notifications

8.5. Some of our services (as instance, mobile games or application) may send push notifications to your mobile device for the purposes prescribed by this Privacy Policy with regard to messages or e-mails. Usually you can manage push notifications in “settings” section of your device.

9. HOW AUTOMATED DECISION-MAKING APPLIES TO YOU

9.1. RoboHero itself do not use your data for profiling or other means of automated decision-making that could affect your legal situation (including your access to the services or other rights under the Terms and Conditions).

9.2. However, some of our partners as described in Section 5 of this Privacy Policy may apply automated decision-making while processing the data, we shared according to Section 5 above (as instance, for the anti-cheat and unfair play prevention purposes).

10. HOW WE SECURE YOUR DATA

10.1. We are constantly working on creation, improvement and further implementation of both administrative (for example, as described in clause 5.9 of this Privacy Policy) and technical measures for securing your data from any unauthorized actions which can be carried out by third parties or occur incidentally, such as unauthorized access, disclosure, alteration, destruction or other malicious use of

your data, as well as incidental loss or corruption of such data. We undertake all reasonable steps and measures which are necessary to ensure your data is treated securely and in accordance with this Privacy Policy.

10.2. Please consider that we maintain some of our servers, where we store your data, and the databases containing your data outside the European Economic Area, and most likely, outside the country of your residence.

11. HOW TO WITHDRAW YOUR CONSENT

11.1. You are entitled to withdraw your consent to process your data under this Privacy Policy at any time by initiating the deletion of your RoboHero Account through your account settings and following the instructions provided by RoboHero after your sending such a deletion request. If you wish to withdraw your consent in respect of a particular processing purpose, please contact us at hello@robohero.io. However, we reserve the right to cease providing you the services if your withdrawal is not consistent with providing services in the manner prescribed by the Terms and Conditions. Please note that such withdrawal does not have any impact on the validity of the consent before withdraw and we reserve the right to process your data on other lawful basis if permitted by applicable law.

11.2. Please also note that uninstalling our game (or any application related to our services) from your device does not automatically result in consent withdrawal or any deleting your personal data from our servers.

12. HOW WE TREAT CHILDREN'S DATA

12.1. We acknowledge the importance of protecting children's data and confirm our special duty to act accordingly. Despite we do not intentionally collect, store or otherwise process any personal data of users under the age of 16, unless we are furnished with the duly obtained consent for that from their parent, legal guardian or other holder of parental responsibility.

12.2. If we learn that we have unintentionally collected personal data from a child under 16 (or a child who has not reached the age of consent in accordance with their applicable legislation) without the consent of that child's holder of parental responsibility, we will take all reasonable steps to erase this information as soon as possible.

12.3. If you find out that your child has provided us with their personal data without your consent, or you believe that we have unintentionally collected your child's data and processed such data in violation of applicable law, you the right to request the removal of any such data by contacting us at hello@robohero.io. We appreciate your providing us with conclusive evidence that:

- the child has not yet reached the minimum age of consent in accordance with their applicable legislation, and
- you are the holder of parental responsibility of such child.

12.4. We strongly encourage parents, legal guardians or other holders of parental responsibility to instruct their children to never disclose their real names, addresses, phone numbers or any other sensitive data about themselves when using our services, in game chats, on the websites (forums, commentaries, etc.) and otherwise on the Internet.

13. HOW WE PROCESS YOUR COOKIES

We may use cookies and other similar tracking technologies (such as web beacons, pixels, device ID, etc.) to recognize you and/or your device for the purposes described in this Privacy Policy. In order to find out more details about our use of cookie files, please see our Cookies Policy available at: hello@robohero.io.

14. HOW WE UPDATE THIS PRIVACY POLICY

We may change this Privacy Policy at any time. In case of substantial changes, updated policy shall be subject to a relevant update notice and refreshing your consent. Unless you agree with the revised version of this document, we reserve the right to suspend providing you our services which require your data processing by

us. In case of minor changes no notice follows, you undertake to check such changes by yourself. Any updates to this Privacy Policy come into effect next day from the at which the updated version of the Privacy Policy is published moment (last revised and effective date).

15. HOW TO CONTACT US

15.1. If, after reviewing this Privacy Policy, you still have any questions on our processing your data, please contact us at hello@robohero.io

15.2. Please also consider that for security reasons your requests concerning exercising your personal data rights as mentioned, among others, in Sections 6, 8, 11 and 12 shall be submitted through our support service at: hello@robohero.io