

KARMA GAMES LIMITED
PRIVACY/ DATA PROTECTION & USAGE POLICY

Last updated: 9 May 2023

A. OVERVIEW

This document explains what information is collected regarding the games published and services provided by Karma Games Limited – Also referred to in this document as “Karma”.

It also explains how Karma uses that information, where Karma stores it and how Karma protects it.

Karma can share the information with partners for the purpose of providing the Games and services.

Karma will not share your information for third party advertising purposes.

This Policy sets out how your personal information is collected, stored and used when you play one of Karma’s games (each a “Game” and together referred to as “Games”) whether accessed by means of a web browser, social networking site or as apps via platforms (including but not limited to Apple AppStore, Google Play, Windows Phone, Android AppStore, Amazon AppStore) and what happens to it regarding any Karma services.

Karma respects your right to privacy and will only process personal information in accordance with applicable legislation in the European Union (which includes the General Data Protection Regulation (EU) 2016/679 or “GDPR” as it is often referred to), the United Kingdom (should it leave the European Union on 1 November 2019 or later, the United States of America and elsewhere.

Karma will store and use your information for as long as you use the Games, have an account with Karma or Karma considers it necessary to fulfil the purposes set out in this Policy which for the avoidance of doubt be different durations. You may at any time make contact us to receive an indication relating to the durations of the storage of the different forms of information (contact, sign-in, gaming history, payment, etc.)

If you have any queries, you can contact us at games@karma.co.uk

KARMA GAMES LIMITED

Karma Games Limited is incorporated and registered in England with company number: 12425040 having a registered office at 56 Short’s Gardens, London, UK, WC2H 9AN and its group of companies (“Karma Games”).

B. POLICY COVERAGE

This Policy explains the different kinds of information Karma may collect from you when you are using the Games whether by using the Games or contacting Karma by e-mail (either directly or through chat-room or social network function), telephone or fax. Legally, Karma cannot and will not collect personal information about children below 13 without parental/ guardian involvement. Karma will comply with applicable privacy laws.

By downloading and/ or accessing any of the Games you hereby agree to be bound by this Policy in respect of the information collected about you. Karma may from time-to-time change this Policy and at any time, for example to reflect changes in Karma’s services or to reflect applicable laws. In the event that Karma makes material changes to the Policy we will make reasonable efforts to notify you prior to such change and update the “Last Updated” date. Once Karma changes the Policy, it will become legally binding on you as of the date of publication (i.e. the new “Last updated” date). Should you not wish to consent to the changes in the Policy you should stop using the Games. This Policy applies to people who use the Games and people who make complaints to us by e-mail. If you do not agree to those changes (regardless of whether you e-mail us), then unfortunately we must ask you to cease using all Games: in order to make the Games work properly Karma needs to have a regularised set of rules applying to all users.

This Policy applies to the Games, plus all other Karma products and services, including (but not limited to) user accounts, customer and technical support, official forums, wikis, blogs and social media services.

This Policy governs personal information (or, in the United States of America, personally identifiable information) and non-personal information (or, in the United States of America, non-personally identifiable information), which Karma collects from you when you are using the Games (“personal information” means information, which, on its own or in combination with other information, can be used to identify you).

Karma recognises that it has a special obligation to protect personal information obtained from children. Karma does not and will not knowingly collect personal information from any child under the age of 13 without consent from their parent or guardian. If you are a parent or guardian and are concerned about the transfer of personal information about your child, please contact: games@karma.co.uk

If you are under 13 or a minor in your country of residence, you will need your parent or legal guardian’s permission to use and access the Games. The Games may be intended for users aged 13 and above. However, the content of the Games has been rated by Apple as being acceptable for ages 13 and above. Karma does not request, seek, verify or track the age of its players, as such any individual who has access to a device of any age may play a Game and, in circumstances where the individual is unsupervised, make purchases without the device owner’s permission or consent. Please be aware that it is the platform providers (Apple AppStore, Google Play, Windows Phone, Android AppStore, Amazon AppStore, etc.) and not Karma who control the payment process for in-app purchases. Therefore, any and all queries or application for refunds should be made directly to the platform provider. Information relating to the relevant complaints procedure will ordinarily be set out within the body of the invoices received from the platform providers.

Karma respects your right to privacy and will only process personal information in accordance with applicable legislation in the European Union, the United Kingdom (should it leave the European Union on 1 November 2019 or later, the United States of America and elsewhere. For personal information contained in this Policy which is used by Karma in connection with the Games, Karma is the data controller under European Union data protection legislation.

C. INFORMATION COVERED

Karma may collect certain information when you use the games such as your name and e-mail address, etc. Karma does not receive or store your payment details. Please also read our Cookie Policy below.

When you sign up for, download, use or play the Games Karma will collect certain information from you. This information may include: your name; your date of birth; your e-mail address; any user name used to identify yourself; photograph(s); avatar(s); details of your digital platform account; any other information which you supply us via our services (including the content of messages sent using any chat/ communications systems); technical details about any device which you use to access the Games, including: Internet and/ or network connection (including IP address); any mobile device identifier, MAC address or console device identifier; your operating system, browser type or other software; or your hardware or other technical details (this is technical data about our users and their actions and patterns which does not provide personal information); details of your use of the services (including, but not limited to, metrics information about when and how you use the services, traffic data, country of residence, contact information and your geographical location data). Karma may, at its discretion, create a unique user identifier to analyse your use of Games, this unique identifier may be stored with your personal information. The data collected in relation to your use of Games may include (but is not limited to): metrics information regarding how and when you play Games; language preferences; in-game purchases; achievements; scores; gameplay statistics and time spent playing Games.

If/ when Karma decides to deploy social networking features in any of the Games, should you decide to link the Games to a social networking account(s), then Karma may collect details about your use of social networking account(s) and the services. This may potentially include certain information from Facebook, Twitter, Instagram, Snapchat, Tiktok or other social networks

(including access to your name, location, gender, birth date, e-mail address, photograph(s), profile URL and friends list as well as aggregated non-personal analytics data about our users) strictly in accordance with the relevant social network(s)' terms and conditions; other information required in order to help you with any queries or support matters.

Some of the information types referred to above may be collected on an aggregated or anonymised (e.g. hashed) basis, or Karma may use it or share it in an aggregated or anonymised way, for research or analysis into the way the Games and services operate and are used.

The processing and storage of payment details is a matter for the relevant platform and payment method/ processor. Karma will not receive, process or store any of your payment details. Payment transactions are completed through the relevant platforms (for example, Apple's AppStore, Google Play, etc.) via the personal e-mail address you have associated with that platform account. If you make in-game purchases within the Games, we are notified by the payment processor once a transaction takes place (which may provide Karma with an approximate location as to where you are using the Games and on which particular type of device), but Karma will not receive any of your actual payment details.

Karma will also collect information about you via cookies. You can find out more about Karma's use of cookies in Karma's Cookie Policy below. The Cookie Policy forms part of this Policy.

D. COLLECTION OF INFORMATION

Karma will collect information ourselves or via third parties for appropriate matters.

Information may be collected or processed regarding you in the following ways:

- information you give Karma via the Games (including, but not limited to: contact and sign-in details; your device(s); purchase history; profile picture(s); avatar(s); social network and chat functions; geographical location);
- information given when you contact Karma or report a problem with the Games;
- Karma may also ask you to complete surveys that Karma uses for research purposes, although you are not obliged to respond to them;
- information generated by your gaming history.

Karma may collect this information via the Games or trusted third-parties connected with Karma for optional things like surveys or polls.

E. STORAGE OF INFORMATION

Karma will store your information in the European Economic Area. Karma will use reasonable commercial endeavours to keep this information secure.

Karma will deploy technology and protocols to safeguard your privacy and personal data from unauthorised access and improper use (via secure servers). You should also from time-to-time change and vary your account settings on your social networks to prevent Karma and third-parties accessing information in relation to you. Karma does not intend to collect information about you which is categorised as "personal data", although Karma may collect and share your social network identifiers in accordance with the relevant social network(s)' policies and as described above. No online service or website can be completely secure, Karma would caution you to protect the account information in your possession as well.

The information Karma holds will be stored and processed in the European Economic Area.

By submitting your personal information, you agree to such transfer, storing and/ or processing.

Karma will use your information to run, maintain and improve the Games as well as to communicate with you (for example by means of newsletters or e-mails).

Sometimes Karma may share anonymised, non-personal information in relation to operating system types with partners in order to run the Games.

Your information may be used in the following ways (and for which Karma has a valid and legitimate legal reason):

- to ensure that the Games are presented in the most effective manner for you and for your device from which you access them;
- to provide you with better select marketing information, products or services that you request from Karma and which Karma feels may interest you (by way of example, Karma may send you newsletters or e-mails about the Games (which will be optional and for which Karma will request prior permission, where required));
- to carry out Karma's obligations arising from any contracts between us;
- to allow you to participate in interactive features of the Games should you choose to do so;
- to notify you about changes to the Games;
- to provide, maintain, protect and improve the Games and to protect Karma and other Games users;
- to comply with intellectual property protection obligations we have under applicable laws including the Digital Millennium Copyright Act and the E-Commerce Directive;
- to comply with a legal obligation;
- to assess the performance of the Games.

Karma may share some aggregated and general non-personal information on user behaviour (for example, sales per region) with Karma's partners who work with Karma to provide the Games (for example, with payment providers) in order to support, improve or amend Games.

Karma may also share non-personal information with data analysis services to help Karma run the Games.

F. USE OF INFORMATION & THIRD-PARTIES

You have the option to share your own personal information with other parties, in which case it will be governed by those parties' own privacy policies, please make sure to you familiarise yourself with those policies.

Karma is not responsible for the privacy policies and practices adopted by other parties notwithstanding that you have accessed them using links from the Games, adverts in Games or from adverts on a website when you are playing the Games. Karma recommends that you visit and contact the owner or operator if you have any concerns or questions in this regard.

You should be mindful that any communications you have via the Games may reveal details about you. Also, any information you post publicly will be publicly available to other people.

Karma is not responsible for your use of any otherwise private personal information which you make available, or the activities of other users or other third-parties to whom you give or make available your information or content.

The Games may, from time-to-time, contain or connect you with third-party content or services. This Policy does not extend to external sites or companies, so please refer directly to the applicable privacy policies.

Karma may work with third party service providers (for example advertisement network and measurement services) to display advertising in the Games and to manage Karma's advertisements or marketing on third-party sites. Karma may share certain information (such as your e-mail address, country of residence and your age) with third-parties so that Karma may better target advertisements and content to you. You can choose to prevent your device's advertisement identifier being used for Interest based advertising by updating the settings on your device and you may be able to opt-out from the collection of information by some of Karma's advertising partners as further detailed in Karma's [Cookie Policy](#).

Some of the Games will display advertisements, in the form of either banners, full screen adverts or short in-play videos. You may be able to take action to avoid advertisements via in-

play purchases or refinements to your settings. The advertisements are provided by third-parties. Where advertisements are deployed on your device advertising identifiers will provide information relating to your device(s) to those entities serving the advertising to you to better direct and personalise the advertisements to you. You will have the opportunity to opt-out of receiving advertisements by turning off the advertising identifier on your device(s) (please see your device(s) operating manual). You should be aware that following such opt-out you will continue to see advertisements, however, such advertisements will not be based on your profile and, therefore, may be less relevant to you.

Should Karma determine to sell, reorganise or merge its business Karma may transfer personal information to a third-party who will protect this to at least the same level as Karma does in accordance with this Policy.

G. MISCELLANEOUS

Please be aware that Karma is or will be subject to various laws and Karma may be required to release personal information in order to comply with legal requirements.

Karma may transfer personal information to an associated third-party or Karma Group company who will protect this to at least the same level as Karma does in this Policy.

H. USER RIGHTS

You have rights about how your personal information is used, which can vary depending on where you live. You are entitled to access (with a corresponding right to rectify incorrect information), withdraw consent for, object to, restrict the processing of and erase your personal information. Should you wish to have your personal information erased Karma will remove all personal information from the Games and you will lose progress and in-app purchases. Karma will not be able to restore any erased information. If you have any questions, please contact Karma at: games@karma.co.uk

You have the right to ask Karma not to process your personal information for marketing purposes. You can change your e-mail settings to unsubscribe from e-mail communications.

Depending on where you live, you may have additional privacy rights. For example, in the European Union (under GDPR) you have the right to access the personal information that Karma possesses about you and you may have the legal right to contact Karma to request that we rectify any incorrect or incomplete data, erase, delete or block your personal information from Karma's system.

Karma will use reasonable efforts to deal with your request, but Karma may decline requests that are unreasonably repetitive, are disproportionate or infringe the privacy of others.

Under California law, California residents who have an established business relationship with Karma have the right to request certain information with respect to the types of personal information Karma has shared with third-parties for their direct marketing purposes, and the identities of those third-parties, within the immediately preceding calendar year, subject to certain exceptions. All requests for such information must be in writing and sent to: Karma Games Limited, 56 Short's Gardens, London, UK WC2H 9AN. This same California law permits Karma to provide you, in response to your written request, with a cost-free means to choose not to have your information shared rather than providing the above-described information. You may exercise that choice by contacting Karma at the address above.

If you would like to exercise any of these rights or have any queries regarding them, please contact: games@karma.co.uk

KARMA GAMES LIMITED

Cookie Policy

Last updated: 23 September 2019

Karma uses technologies in its games, its websites, all other Karma products and services, (including, but not limited to, user accounts, customer and technical support, official forums, wikis, blogs and social media services) (the “Services”) to collect information that helps Karma improve your online experience. Karma refers to these technologies, which include cookies, collectively as “cookies”. This Policy explains the different types of cookies used on the Services and how you can control them.

Karma hopes that this Policy helps you understand and feel more confident about our use of cookies.

If you have any further queries, please contact us at games@karma.co.uk

Please also see our Privacy Policy above.

1. By accessing or using the Services you authorise Karma to collect certain technical information in order to:-

- analyse usage of the Services;
- provide a more personalised experience; and
- manage advertising.

Karma, and Karma’s third-party service providers, may use server log files or web log files and tracking technologies to collect and analyse certain types of technical information, including, but not limited to, cookies, IP addresses, device type, device identifiers, browser types, browser language, URLs, domain names, landing pages, game state, the date and time of usage of the Services, and other similar information.

2. Karma may also use other technologies, including, but not limited to, web bugs, tracking pixels and cookies. Web bugs inform Karma should a certain page be visited or whether an e-mail was opened, while tracking pixels allow Karma to advertise more efficiently by excluding current users from certain promotional messages, identifying the source of a new installation or delivering ads to you on other websites. Cookies allow Karma to improve the quality of the Services, make recommendations, and make the Services easier to use for you. A cookie is a small text file recorded on your computer’s hard drive that identifies you as a unique user and contains certain information about your particular log-in session and/ or your use of the Services. Please note that companies delivering advertisements within the Services may also use cookies or other technologies, and those practices are subject to their own policies.
3. Karma uses Facebook’s Custom Audience feature to target users with advertising from time-to-time. Custom Audiences allows Karma to target ads to a specific set of people through Facebook. You can manage your privacy settings in the privacy tab of your Facebook account.
4. Regarding Karma specific websites including: <https://games.karma.co.uk>, <https://karma.co.uk>

These sites use Google Analytics including its Re-marketing feature based on Display Advertising (www.google.com/analytics/) for online advertising and for website analytics purposes – meaning that Karma uses them to see how many visitors visit its site, the pages that generate interest and the links that visitors most often click on (amongst other things). Google Analytics uses cookies – small text files that are placed on your computer’s hard drive that store certain limited information about you. The cookies Karma uses do not enable any visitor to our site to be individually identified and will only be used for online advertising and website analytics purposes. You may opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Preferences Manager.

In addition, the websites use cookies, flash cookies, web beacons and similar technologies to collect information about you. This enables Karma to tailor its service

offering (including Karma websites) to provide you with products and services which are more relevant to your individual tastes. Karma and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on your past visits to Karma sites. Third-party vendors, including Google, show Karma ads on sites across the Internet. You may change your website browser settings to reject cookies, although please note that if you do this it may impair the functionality of Karma websites. For further information about cookies, including how to refuse cookies, please visit www.allaboutcookies.org.

5. Karma may change this Cookie Policy at any time: please take a look at the “LAST UPDATED” date at the top of this policy to see when it was last revised. Any amendments to this Cookie Policy will come into effect a reasonable period of time after this “LAST UPDATED” date (for these purposes we consider 30 days to be a reasonable time period) unless you contact Karma before that date to discuss or query any of the amendments.