

PRIVACY AND DATA POLICY

ISSUED BY INTROVERSION SOFTWARE LIMITED

Last Updated: 6 June 2018

1. INTRODUCTION AND GENERAL TERMS

These terms apply to the use of games and other products developed by Introversion Software Limited ('Introversion' / 'we' / 'us'). Our registered office is at Winchester House, 36 Winchester Road, Walton On Thames, Surrey, KT12 2RH. We are a company registered in England, with company number 04354601.

This privacy and data policy ("**Privacy Policy**") applies and has effect in respect of all games, related online services (including online network play connectivity and interactivity) and other software and products made available by us (together the "**Game(s)**"), as well as any other online features relating to the Games including our website (<https://www.introversion.co.uk/introversion/>) (the "**Website**"), mailing list (<http://introversion.us5.list-manage.com/subscribe?u=92bdc42550e7f2323d1a4bde9&id=5821980e51>) (the "**Mailing List**"), our online forums (<https://forums.introversion.co.uk/>) (the "**Forums**") and user support Centre (<http://support.introversion.co.uk/>) (the "**Support Centre**"). Together the Game(s), the Website, the Mailing List, the Forums and the Support Centre are referred to as the "**Online Services**".

If you have any questions or comments about this Privacy Policy, please contact our Data Protection Officer, John Knottenbelt, at support@introversion.co.uk

We are committed to protecting and respecting your privacy. The Privacy Policy explains the basis on which personal information we collect from you will be processed by us or on our behalf. Where we decide the purpose or means for which personal data you supply through these Online Services is processed, we are the "data controller." We will comply with all applicable data protection laws, including the General Data Protection Regulation 2016/679.

Please read this Privacy Policy carefully as it contains important information about the following:

- What information we may collect about you;
- How we will use information we collect about you;
- Whether we will disclose your details to anyone else; and
- Your choices and rights regarding the personal information you have provided to us.

This Privacy Policy forms a part of and should be read in conjunction with our terms of use for the Website and end user licence agreements for each of the Games, which can all be found at <https://www.introversion.co.uk/introversion/legal/>.

The Online Services may contain hyperlinks to services owned and operated by third parties. These third party services may have their own privacy policies and we recommend that you review them. They will govern the use of personal information that you submit or which is collected by cookies and other tracking technologies whilst using these services. We do not accept any responsibility or liability for the privacy practices of such third party services and your use of these is at your own risk.

We may make changes to this Privacy Policy in future, which will be posted on this page. You should check this page from time to time to ensure you are aware of any changes. Where appropriate we may notify you of changes through the Games.

2. INFORMATION WE MAY COLLECT ABOUT YOU

We collect and process the following information which may include your personal data.

Information provided by you when using the Games

("Basic Information")

We will collect the following information from you when you play our Games:

- your mobile device's unique device ID (Device ID) (if applicable);
- your console's unique device ID (Console ID) (if applicable);
- your Google Play ID (if applicable);
- your iOS game center ID (Prison Architect only);
- your Steam ID (if applicable);
- any third party platform profile display names;
- your user preferences; and

Core information milestones related to your gameplay, such as your overall progression to a particular level or stage, or the completion of certain activities during your gameplay (for example, completing a tutorial or passing a level).

Information collected when you purchase any of the Games online

("Purchase Information")

When you purchase any of the Games online we may collect the following information from you:

- your name;
- your Order ID;
- your email address;
- your IP Address;
- the date of Purchase;
- the last 4 digits of the card used to make the purchase;
- the EU VAT country (if applicable); and
- a log of the download date/time of the purchased Game.

Contact information provided by you when you contact us or use the Support Centre

("Contact Information")

We may ask you for, or you may submit, certain contact information to us whenever you contact us through the Support Centre or via support@introversion.co.uk.

This may include:

- your email address; and
- your name.

Information provided when you register your purchase of Prison Architect

("Registration Information")

In order to access restricted sections of the Website, such as the private developer forum, wiki and bugs database, as well as being able to access all previous builds of Prison Architect and the latest Alpha builds as soon as they are available, you are required to prove that you have purchased Prison Architect by registering and providing the following information:

- username / email address; and
- encrypted password.

Once registered, you may then submit bug reports.

Information provided by you when using our source code repositories for Uplink, Defcon, Darwinia and Multwinia

("Repository Information")

Users who have purchased access to our source code repositories for Uplink, Defcon, Darwinia and Multwinia may be asked to provide their Forum username and password, as well as providing any source code they wish to upload.

Information provided by you when using the Forums
("Forum Information")

In order to set up an account to use the Forums, we will collect the following information from you:

- username;
- email address;
- password; and
- a unique Forum User ID which identifies your account.

If you wish to do so, you may also provide the following information when using the Forums:

- date of birth;
- location;
- interests;
- occupation;
- jabber address;
- ICQ;
- a link to your website;
- details relating to your accounts for the following: Yahoo Messenger; AOL; Facebook; Google+; Skype; Twitter; and YouTube.

Information collected for the purposes of providing analytics

("Analytics")

We may collect technical information about your use of the Online Services through the use of tracking technologies and analytics.

Personal data we may collect includes the following:

- how many times you visit the Website;
- which pages you go to;
- traffic data;
- your IP and MAC address;
- your internet service provider;
- your Device ID;
- your Console ID;
- your user ID (which is generated by us and allocated to you when you first play our Games);
- your device operating system & version;
- your device make and model;
- game play attempts, progression and results;
- session game time start, end and duration;
- the country of your device; and
- identification of crashes and defects.

We use the following third party analytics providers:

- Google Analytics
- SiftScience

Google and SiftScience may collect analytics data on our behalf and in accordance with our instructions, and its applicable privacy notice. If you would like to find out more about the way Google collect and process this information this is likely to be set out in their privacy policies and/or terms and conditions. Please refer to <https://policies.google.com/privacy>.

Contact information provided by you when you sign up to our Mailing List

("Mailing List Information")

We may ask you for, or you may submit, certain contact information to us whenever you sign up to our Mailing List.

This may include:

- your email address; and
- your name.

Content created by our users which we host and display on the Forums and in the Support Centre

("User Content")

When users submit their own User Content to the Forums or Support Centre, this content may contain personal and non-personal information. This could include information in or about the User Content, such as the location of a photo or the date a file was created, or anything else a user decides to communicate using these parts of our Online Services.

3. WHY WE COLLECT INFORMATION ABOUT YOU

To provide the Online Services to you

We will use information about you (including Basic Information, Registration Information, Repository Information, Analytics and User Content) for delivering our Games to you under the terms of use agreed between us. The processing of information in this way is necessary for us to record your progress and current status within a Game, and to ensure the Games deliver the features promised and function properly, so that you have the best experience when playing any one of our Games and using the Online Services.

To help us improve the Online Services and fix any problems

We may process information about you (including Basic Information, Purchase Information, User Content, Registration Information, Repository Information, and Analytics) so that we can analyse and improve our Games and Online Services.

This processing is also necessary for us to pursue our legitimate interests of (i) ensuring that our Online Services function properly so that you and other users have the best experience when playing any of our Game(s) and using the other Online Services; (ii) improving the quality of our Online Services, and providing a better experience to our users; and (iii) identifying and correcting any bugs in the Games and Online Services.

To respond to your enquiries and requests for support and to enable you to use the Forums and Support Centre

We may process Contact Information so that we are able to properly respond to your enquiries and support requests either via the Support Centre or through support@introversion.co.uk and we may process Forum Information so you are able to use the Forums, in accordance with the terms of use agreed between us.

To acquire new users and engage current users

- We may process Purchase Information and Mailing List Information to make suggestions and recommendations to you and other users of our Games about goods and services that may interest you or them, to provide you with information about other games and services we offer that are similar to those that you have already purchased and to notify you about changes to our Games or the services we provide.
- We may also process this information to pursue our legitimate interests of acquiring new users for our Games.
- We may process Purchase Information at an aggregated level to pursue our legitimate interest of creating daily sales reports and to improve the relevancy of our marketing.

We use various forms of marketing to acquire new users. The information we collect about you may be used to improve the relevancy of our marketing, including the creation of 'lookalike' audiences. This allows us to offer more relevant marketing to potential new service users without using information that personally identifies you. We may use Facebook Pixel and Google DoubleClick Manager, or equivalent services, to create lookalike audiences for these purposes. For more information about the way in which Facebook and Google may collect and process your information can be found at: <https://www.facebook.com/privacy/explanation> and <https://policies.google.com/?hl=en>.

To prevent fraud and illegal activity

We process personal data (including Purchase Information) for our legitimate interests of ensuring that any use of the Online Services is lawful and non-fraudulent, does not disrupt the operation of our services, does not harass our staff or other individuals, to enforce our legal rights and to comply with our legal obligations.

Where we reasonably believe that you are or may be in breach of any applicable laws or our terms of use, we may use your personal information to inform relevant third parties such as your law enforcement agencies about the content.

We reserve the right to disclose your identity to any third party who is claiming that any User Content posted by you constitutes a violation of their intellectual property rights, or of their right to privacy. You may not copy, download, or embed any User Content without the express written permission of the content owner. You may not use any User Content for any commercial purposes, or any public performances.

When you purchase the Games online we work with SendOwl to assist us with customer support, fraud prevention and tax calculations. Further details about the way in which SendOwl may collect and process your information can be found in their privacy policy at <https://www.sendowl.com/privacy>.

4. COOKIES

A cookie is a text file placed onto your device when you access our Games or Website. We use cookies and other online tracking devices such as web beacons, and flash object storage to deliver, improve and monitor our Website and Games, including in the following ways:

Authentication	To log you into our Website and Games and keep you logged in.
E-commerce	To keep track of items you have purchased in our Games or which you are interested in, and to take you through the checkout process.
Preferences	To remember information about you such as your preferred language and configuration.
Analytics	To help us understand how you use our Games and Website, and how often, so we can improve them to deliver a better experience for our users. To carry out research and statistical analysis to help improve our content, products and services.
Advertising	To deliver ads which are more relevant to your interests, and to measure their performance.

The information we obtain from our use of cookies will not usually contain your personal data. Although we may obtain information about your device such as your IP address, your browser and/or other internet log information, this will not usually identify you personally.

Our Website should display a notice alerting you to our use of cookies and other similar technologies and linking to this privacy policy. If you use our Website after this notice has been displayed to you we will assume that you consent to our use of cookies or similar technologies for the purposes described in this privacy policy.

Please note that if you choose to disable cookies, or similar technologies, on your device you may be unable to make full use of our Games and Website.

We work with third parties who may also set cookies on our Website, for example Google Analytics, Google AdSense, Facebook, Twitter and YouTube, which we use to display video content, enable social networking functionality and sharing, to deliver ads, and to monitor how visitors use our Games and Website. These third party suppliers are responsible for the cookies they set on your device.

If you want to learn about how to opt out of Google's use of cookies, please visit <https://tools.google.com/dlpage/gaoptout/> or your Google Ads Settings (<https://www.google.com/settings/u/0/ads/authenticated>). The Google Analytics terms of service can be accessed here: www.google.co.uk/analytics/terms/us.html. For further information please visit the website of the relevant third party.

5. DATA SHARING

We will share your information with third parties only in the ways that are described in this Privacy Policy

Group members, personnel, suppliers or subcontractors: We keep your information confidential, but may disclose it to any member of our group (which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006), our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Privacy Policy. However, this is on the basis that they do not make independent use of the information, and have agreed to safeguard it.

Merger or acquisition: If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via, account message and/or a prominent notice on our website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

Required by law: In addition, we may disclose your information to the extent that we are required to do so by law (which may include to government bodies and law enforcement agencies); in connection with any legal proceedings or prospective legal proceedings; and in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

Enforcement: We may also disclose your personal information to third parties in order to enforce or apply the terms of agreements, to investigate potential breaches, or to protect the rights, property or safety of Introversion, our customers, or others.

Digital Content Stores: Where the Games are downloaded through Steam, Xbox Live, PSN, Google Play and/or iTunes, we may disclose your personal information to Valve Corporation, Microsoft, Sony, Google and/or Apple respectively for the purposes of facilitating any payments made through these platforms.

Support Centre: We use a third party platform provider called Salesforce to manage any support requests, queries and issues raised by users through the Support Service or which are sent to support@introversion.co.uk. Further details about the way in which Salesforce may collect and process your information can be found in their terms at <https://www.salesforce.com/company/privacy/>.

Mailing List: We use a third party platform provider called Mailchimp to manage our Mailing List. Further details about the way in which Mailchimp may collect and process your information can be found in their terms at <https://mailchimp.com/legal/privacy/>.

Photon: Some of our Games integrate with *Photon* to process Analytics from those Games. Some of our Games also integrate with *Photon Chat* and *Photon Voice* messaging services and we may also monitor any Basic Information you contribute through the Games via these services to provide support, filtering, and improve the Games. You can find out more about the way *Photon* uses this information here: <https://www.photonengine.com/en/Account/LicenseTerms>.

6. AUTOMATED DECISION MAKING

When you purchase a Game online, SiftScience may use automated decision making methods which do not involve human involvement to process your information only in the ways that are described in this Privacy Policy

Siftscience may process your personal information (including Forum Information, User Content and Purchase Information) via automated decision making methods in order to identify whether a purchase is likely to be fraudulent. SiftScience uses large-scale machine learning to analyse things like what a user clicks or taps on, the rate at which they buy things over a certain period of time, when they signed up for an account, other actions they take on a website or mobile app, email addresses, device information, and billing and shipping addresses. For more information please refer to <https://siftscience.com/products/payment-fraud>.

If a purchase is considered to be a high risk of being fraudulent by the automated decision making method, the purchase will either be rejected or refunded (if the transaction has already taken place). In this scenario the user will be notified of the outcome and will have the right to obtain human intervention to express his or her point of view and to contest the decision to reject or refund the purchase.

7. CONSUMER CONTROL AND OPT-OUT OPTIONS

If you do not wish to receive promotional or other marketing material from us or third parties then you can opt-out by unsubscribing from the Mailing List via MailChimp. Alternatively, you can delate your Forum account or contact us via support@introversion.co.uk and let us know that you no longer wish to receive promotional or other marketing material from us or third parties.

8. YOUR RIGHTS IN RELATION TO PERSONAL DATA WHICH WE PROCESS RELATING TO YOU

You have the following rights over the way we process personal data relating to you, as set out in the table below. We aim to comply without undue delay, and within one month at the latest.

To make a request, please let our Data Protection Officer know by sending an email to support@introversion.co.uk.

Ask for a copy of data we are processing about you and have inaccuracies corrected

You have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected.

We will use reasonable efforts to the extent required by law to supply, correct or delete personal information held about you on our files (and with any third parties to whom it has been disclosed to).

Object to us processing data about you

You can ask us to restrict, stop processing, or to delete your personal data if:

- you consented to our processing the personal data, and have withdrawn that consent;
- we no longer need to process that personal data for the reason it was collected;
- we are processing that personal data because it is in the public interest or it is in order to pursue a legitimate interest of Introversion or a third party, you don't agree with that processing, and there is no overriding legitimate interest for us to continue processing it;
- the personal data was unlawfully processed;
- you need the personal data to be deleted in order to comply with legal obligations;
- the personal data is processed in relation to the offer of a service to a child.

Obtain a machine readable copy of your personal data, which you can use with another service provider

- If we are processing data in order to perform our obligations to you, or because you consented, or if that processing is carried out by automated means, we will help you to move, copy or transfer your personal data to other IT systems.
- If you request, we will supply you with the relevant personal data in a commonly used, machine-readable and interoperable format. Where it is technically feasible, you can ask us to send this information directly to another IT system provider if you prefer.

Make a complaint to a Supervisory Authority

- If you are unhappy with the way we are processing your personal data, please let us know by contacting us via the support services.
- If you do not agree with the way we have processed your data or responded to your concerns, an alternative is to submit a complaint to a Data Protection Supervisory Authority.

9. DATA RETENTION

We will hold your personal information on our systems for as long as is necessary for the relevant service, or as otherwise described in this Privacy Policy.

Purchase Information, User Content and Forum Information are retained indefinitely. If you would like us to delete your Forum account or any User Content that you have posted, please let us know by sending an email to support@introversion.co.uk.

10. CHILDREN

We do not use our Online Services to knowingly solicit information from or market to children under the age of 13. Our terms of use prohibit users aged under 13 years from accessing our Online Services. In the event that we learn that we have collected personal information from a child under 13 years of age we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13 years of age please contact us at support@introversion.co.uk.

11. SECURITY

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information. For example, our databases are password protected and are placed in a virtual private cloud (VPC) and so are only accessible to our web server machines that need access in order to provide login and account functionality to the users. It is impossible to make a connection to the databases from outside the VPC.

Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

12. INTERNATIONAL DATA TRANSFERS

It is possible that your personal information may be transferred outside of the EEA by Mailchimp, SiftScience, Google, Valve Corporation, Microsoft, Sony, Apple, SendOwl, Salesforce and Photon. We recommend that you refer to the privacy policies and/or terms and conditions of these third parties if you are concerned about your data being transferred outside the EEA.

Our servers are hosted by Amazon Web Services located in Virginia, USA.

Where we transfer your information outside of the EEA, we have agreements in place with those parties which include standard data protection clauses adopted by a data protection regulator and approved by the European Commission to ensure that appropriate safeguards are in place to protect your personal data. If you would like to find out more about these safeguards, please let us know by writing to support@introversion.co.uk.

CONTACT INFORMATION

All questions, comments or enquiries should be directed to Introversion at support@introversion.co.uk. We will endeavour to respond to any query or questions within three business days.

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