

# **Privacy Policy**

Staay AG («Staay», «we», «us») cares about your privacy. We treat your personal data confidentially and handle it in compliance with national and international data protection requirements (like GDPR) and this privacy policy.

Our Privacy Policy provides information on how we collect, process, and protect your personal data in all our operations and services, as well as your rights regarding such data. If you do not agree with this Policy, we recommend you not to use any of our services. If you change your mind in the future, you must stop playing our games and you may exercise your rights in relation to your data as set in this policy.

We only collect and process personal data to such an extent that is necessary for our services, mainly developing and running games and websites. We use your data to provide our services, to communicate with you or to provide customer support. We also send some of your data to third parties like advertising networks or for usage tracking.

#### 1. Personal Data we collect

To run our services properly, we will collect, store, and use mainly the following data.

#### Data you provide to us

- Registration data like username, e-mail, date of birth, password
- Data you provide when using our games like friends and friendship requests
- Data collected when using our support channels like name, e-mail, any information you share with us

#### Data we automatically collect or is generated when you play our games

- Identifiers like device ID, IP address, app ID, operating system, device model
- Data you generate when playing our games like items collected, games played, ranking, experience
  points, ingame currency, subscription type, in-app purchases, transaction records, behavioral data for
  anticheating reasons

#### Data we receive from third parties

- Payment processors: When you make payments in our games we receive data about your transactions like your user ID
- Analytics: We use GameAnalytics to analyse the usage of our games. They send us reports that make us able to improve our services.
- Facebook Connect: When you connect to Facebook, we receive the following information: public profile, facebook id and friends list. By connecting to Facebook in the game you will be agreeing to their Terms and Conditions and Privacy Policy
- Google Analytics: We use Google Analytics to track usage of our website. You can always opt out with the
  Google Analytics Opt-Out Browser Add-on that can be downloaded for free:
  <a href="https://tools.google.com/dlpage/gaoptout/?hl=en-GB">https://tools.google.com/dlpage/gaoptout/?hl=en-GB</a>



- **Cookies:** To offer you a more user-friendly experience our website uses cookies. Some come from third parties like Google Analytics. Most of the cookies will delete themselves after your visit. But you can always clear your browser cookies at any time in your web browser's settings menu.
- Ad Networks: Our services use built-in advertising by third-party advertising networks. This allows us to offer our services for free. When you view an advertisement in the game, the advertising network receives and processes your Unique Identification for Advertising (IDFA). Advertising networks use this to send you advertising. Advertising networks handle your IDFA in accordance with their privacy policies, which you can consult on their website. We work with the following ad networks. Please check the following privacy policies to learn more about their privacy practices, including how you may exercise your data subject rights.
  - AppLovin, <a href="https://www.applovin.com/privacy/">https://www.applovin.com/privacy/</a>
  - Admob (Google Ad Network), <a href="https://policies.google.com/privacy?hl=de">https://policies.google.com/privacy?hl=de</a>
  - Facebook Audience Network, https://www.facebook.com/policy.php
  - ironSource, <a href="https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/">https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/</a>
  - Unity Ads, <a href="https://unity3d.com/de/legal/privacy-policy">https://unity3d.com/de/legal/privacy-policy</a>
  - Vungle, <a href="https://vungle.com/privacy/">https://vungle.com/privacy/</a>

We may change the advertising networks we work with without updating our Privacy Policy. For a fully updated list, please email <u>privacy@staay.io</u>

## 2. How we use your personal data

#### Run, monitor and improve the games

We use your data to provide our services, to communicate with you or to provide customer support. We need your personal data to be able to monitor and improve our services and games and to be able to properly run the services.

#### Send you interesting news and offers

We will send you information and updates about our games or offers that might be interesting for you by e-mail, in-game or by push notifications. Your consent can be withdrawn at any time by unsubscribing from the newsletter or deactivating push notifications in your device settings.

#### Provide you with advertising

Our games are free to use. We earn something when you watch advertisements in our games. These ads may be automatically tailored to your interests based on the data we have from you. If you no longer want to receive targeted advertising you always have the possibility to withdraw your consent in the settings area of our games. This will not have an impact on the amount of advertisements you will see, they are then just not matching your interests any more.

## 3. Your rights: Information, transfer & deletion of your data

You always have the right to review the data we have collected of you. Upon your request we will permanently delete all the data we have from you, free of charge. In such case you will lose all your progress in our games, including in-game purchases you may have made. Upon request, we will also prepare all your data to a machine-readable file so you can transfer it to another service, free of charge.



Please send us an email to <u>privacy@staay.io</u> with the following information: Username including # and the four digits (to be found in the app profile) and type of request: Information, Deletion or transfer.

## 4. Your data at third party services

In our services we use third party providers that process data on our behalf. These networks and tools help us to optimize and improve our services and finally to deliver you better experiences.

The third parties we work with only have the right to process your personal data to the extent necessary for carrying out the agreed services. This means that the third-party subcontractors cannot use your personal data for their own purposes. Any service provider we use is under contractual obligation to ensure data protection in all processing of your personal data.

#### 5. Children

Our games are not targeted at children. We do not knowingly collect personal data from anyone under the age of 13 or knowingly allow such persons to use our service. If you are under 13, you are not allowed to send us any information about yourself to us. As soon as we learn that we have collected personal information from a child under age 13, we will delete that information.

#### 6. Data retention

We will retain your personal data as long as you are registered or using our games. And after that for up to three years from the date you stop interacting with our games or until we receive a request for deletion.

### 7. Data Protection Representative in the EU

As a Swiss company we have a data protection representative in the EU as a point of contact for supervisory authorities and data subjects on all issues relating to EU data protection law:

JEFF Berlin GmbH Timo Mischke Glogauer Strasse 19a 10999 Berlin (Germany)

## 8. Contact information

If you have questions or concerns about our Privacy Policy or practices, please contact us at privacy@staay.io.

Staay AG Grubenstrasse 15 8045 Zürich UID: CHE-333.891.796



# 9. Changes to this Policy

From time to time, we may update this Privacy Policy. Here you will always find the current version of the policy. Last update: 23.11.2020.