

## **Privacy and cookie policy**

Last updated: February 22, 2022

This privacy policy focuses on how we will process your personal data when you use our website [www.110industries.com](http://www.110industries.com) ("Website").

### **You must be 18+ to use the Website**

If you do not understand this page, please ask your parent or guardian to explain it to you.

We collect information about you in different ways, for example, when you use this Website.

When you register on Website we'll ask you for information about you.

We will need to use information we have about you to allow you to use Website. This means we might need to share your information with people and companies who help us run our Website, and who might be based around the world.

You (or your parent or guardian) can tell us if information we store about you is wrong or if you think we should delete some of your information or stop using it in a certain way. You can also ask to see your information at any time and can see your profile information via your account (if applicable).

If you are worried about how we handle your information, you or your parent (or guardian) can also email us at [legal@110industries.com](mailto:legal@110industries.com) and speak to your national data protection authority.

This privacy policy also describes how we will process your personal data when you interact with us in other ways, for example, when you contact us or use our website.

### ***Who are we?***

We are 110 Industries SA at Route de Lully 5C, 1131 Tolochenaz, Switzerland, registered at the Company Registry of canton de Vaud with registration number CH-550.1.197.155-4.

We are a controller of your personal data under data protection legislation which means that we are responsible for how the personal data we hold about you is processed.

### ***How do we collect personal data?***

We collect personal data directly from you. You will provide us with your personal data when you use the Website.

### **Advertising**

We may also receive personal data about you as part of our advertising campaigns, for example, via social media platforms such as Facebook and other online platforms such as IGN and as part of us receiving insights into whether our advertising campaigns are successful, including engaging third parties to help us understand players' journeys to the game.

## **Social media**

We may also receive your personal data through social media and other online platforms such as YouTube, Twitter, Instagram, Facebook and Twitch when you use tools to tag us and mention us in your posts, statuses and comments through your accounts on these platforms, and when you otherwise provide us with your personal data on our accounts on these platforms, e.g. when you comment on one of our posts on Facebook.

We will also receive any information you make available on our Discord channel, for example, public communications with other individuals and content you make available on Discord – for example, any videos, photographs or comments you share on Discord or on any of our other online profiles on other platforms.

Any information you post publicly will be publicly available to other people. This might be information you share on a forum such as Discord or on social media.

PLEASE DO NOT SHARE ANY SENSITIVE INFORMATION (FOR EXAMPLE, INFORMATION ABOUT MEDICAL CONDITIONS) OR INFORMATION ON YOUR RESIDENTIAL ADDRESS ON ONLINE FORUMS OR OTHERWISE MAKE IT AVAILABLE TO US OR OTHER PARTIES VIA ANY POSTS OR COMMUNICATIONS.

You should check the privacy policies of any social media platforms or other online platforms such as Discord if you have a query concerning how your data is being processed by these platforms, before reaching out to us.

## **Steam**

We may also collect your personal data through Steam, when you communicate with us via a Steam forum. We may also collect your personal data from other individuals who may, for example, mention you in any communications they send to us.

## **Correspondence and other third parties**

We may also collect your personal data through any platforms you use to contact us and to be part of our community, for example, when you communicate with us or other individuals via our Discord forum or when you contact us via our contact form on our Website.

When you sign up to our mailing list on our Website, we will receive any personal data you provide as part of the sign up process.

We may also collect your personal data from other individuals who may, for example, mention you in any communications they send to us or make available about you on social media and other platforms. If you work at an organisation we have a relationship with, we may receive your personal data from them.

We may also receive personal data about you from other entities within our group of companies.

We may also receive personal data about you from any other types of organisations listed in the section titled '**Will we ever share any of your personal data with other parties?**' below.

## ***What personal data do we collect?***

When you fill the form on our Website we collect basic information such as your name and email.

We will receive any data you make available on our online profiles, for example on Discord or other social media platforms, including data in any videos, photographs and comments you or others share about you.

We may also receive any data that is included in any correspondence you have with our team, including on any online forums, or when an individual mentions you in any correspondence they send to us. When you sign up to our mailing list on our website, we will receive any personal data you provide as part of the sign up process.

We may also collect personal data used to promote our offerings, for example, information regarding demographics, interests and behaviors.

**How do we use your personal data?**

In accordance with data protection laws, we will only process your personal data if we have a lawful basis for doing so.

In respect of your personal data, these bases are: (i) if it is necessary to provide services to you under the performance of a contract we have with you; (ii) if we are required to do so in accordance with legal obligations; (iii) if you have given your consent; and, (iv) if it is in our legitimate interests to process your personal data, provided that none of these prejudice your own rights, freedoms and interests.

The following is a list of the purposes for which we process your personal data, and the lawful basis on which we carry out such processing.

Purpose	Lawful Basis
Account verification	Necessary for the performance of a contract
To make event/content related information available to you	Necessary for the performance of a contract
To engage with players and potential players including providing advertising on third-party websites and platforms	Legitimate interests of promoting our offerings, including commercial interests in expanding our business
To understand when players have interacted with advertising and been directed to our website	Legitimate interests of understanding the success of advertising campaigns
To administer gaming events	Legitimate interests of promoting our offerings, including commercial interests in expanding our business
To respond to communications	Legitimate interests of handling player communications
To record and analyze customer communications for training purposes	Legitimate interests of improving our customer service
To send you service messages and updates about Website	Necessary for the performance of a contract
To prepare and analyze statistics relating to the use Website by you and other users, testing, to investigate complaints, to seek and analyze feedback and to further develop the game	Legitimate interests of ensuring Website is as enjoyable as possible

To analyze statistics that provide us with an understanding of the level of success of our marketing campaigns	Legitimate interests of better understanding our marketing campaigns
To run our everyday operations, e.g. communications between employees in connection with the provision of our services	Legitimate interests of running our business
To administer and protect our business and the website including troubleshooting, data analysis and system testing	Legitimate interests of running our business, provision of administration and IT services, including network security
To administer a sale or possible sale of the whole of or part of our business or the restructuring of our business	Legitimate interests of facilitating any such possible or actual transaction or restructuring

We may also process your personal data (a) to comply with a legal obligation we are under; and (b) for additional purposes in the future, but only if such purposes are compatible with those listed above and if we believe that the same lawful basis applies.

In certain circumstances, you may be obliged to provide us with your personal data under a statutory or contractual requirement. This might include, but is not limited to, personal data we require to enter into an agreement with you; for tax and accounting purposes; and to enable us to fulfil our compliance and other obligations under relevant legislation or regulation. Failure to provide us with personal data required under a statutory or contractual requirement may prevent us from entering into or performing our obligations under a contract with you.

***When do we disclose your personal data?***

We may disclose your personal data to other parties. We may share your personal data with the following parties:

- Service providers we use to help us operate our business, including organizations that provide us with technology related services, such as our website provider.
- Contractors we engage to assist us in providing our services.
- Social media and other platforms we use to promote our offerings, such as IGN.
- Social media and other online platforms such as YouTube, Twitter, Instagram, Facebook and Twitch which we use to communicate with you or to share photos and text that you share via your profiles on these sites, for example, when you tag us on a post that you make and we reshare that post via our profile on a social media site.
- Advertising partners including those that provide us with insights into the success of our advertising campaigns and how players reach our game.
- Other members of the game community, for example, other individuals you interact with on Discord or when you or others share videos, photographs and comments about you on Discord and other online platforms.
- External professional advisors who need to access such information for the purpose of advising us.
- Law enforcement bodies which may have any reasonable requirement to access your personal data, for example, in order to assist with any investigations, when we bring a claim or defend ourselves against a claim that requires the disclosure of personal data.
- Potential purchasers of our business or investors in it (including in the event of insolvency).

***International transfers***

When your data is transferred internationally, we are required to ensure you are afforded equivalent

protection in respect of your personal data to that provided in the UK and EEA.

Generally, we will put in place appropriate safeguards when making international transfers, for example, by using [specific contractual clauses](#) which have been approved by the European Commission or where applicable, transfer safeguards approved by the [UK government](#) together with supplementary measures if we deem it necessary in the circumstances, for example, further contractual commitments or enhanced security.

### ***How long do we keep your personal data for?***

We will retain your personal data only for as long as necessary to fulfil the purposes we collect it for, including for the purposes of satisfying any contractual requirements or other legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the purposes for which we process the personal data, the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, whether we can achieve those purposes through other means and the applicable legal requirements.

When you get access to the Website, we will retain certain information about you for 12 months.

### ***Cookies and tracking technologies***

We use different types of cookies and tracking technologies (including local storage and session storage technologies) on our website.

Cookies and other tracking technologies allow the website to recognise your device and store or access some information about your preferences or actions.

We currently use the following types of cookies and other technologies on our website, some of which are set by us and some by third party providers:

#### Necessary

Those that are necessary for the operation of our website, for example, to distinguish between visitors who have accepted or not accepted non-necessary cookies and tracking technologies and to implement cookies according to visitor selection, and which enable core functionality such as security, credentials authentication, network management and accessibility.

#### Performance (analytics)

Those that analyze the use of our website, including to detect and resolve problems with the website and improve our website.

#### Functional

Those that are used to provide certain functionalities within our website, for example, to play YouTube videos embedded on our website.

#### Advertising (targeting)

Those that are used to deliver advertisements about our game on third party websites and apps.

#### Information collected by the cookies we use may include:

- the Internet protocol (IP) address used to connect your device or computer to the Internet.
- the location of your device or computer.
- information about your activity on our website, for example, information on items you have clicked on.
- device and browser settings and metrics, for example, event errors and time zone settings.

- content uses history.
- Uniform Resource Locators (URLs) used to gain access to, through and from our website (and relevant information regarding your visits).

Some of the cookies and other tracking technologies set on our website may be set by third party service providers. These providers have access to personal data about you, obtained when you use our website. We set out below the third party cookie providers that set cookies and other tracking technologies on our website.

- Google.
- YouTube.

We use a combination of session and persistent cookies and other tracking technologies. Session cookies and session storage keep track of your current visit and how you navigate the website and persistent cookies and local storage enable our website to recognise you as a repeat visitor when you return. The session technologies will be deleted from your device when you close your browser. Persistent technologies remain on your device after you have left the website.

In addition to being able to refuse non-necessary cookies through the functionality on our website, you can also manage cookies through your browser settings. Most browsers have cookies enabled by default, but you are able to change your cookie settings, which are usually found in the 'options' or 'preferences' menu of your internet browser. You can block any cookies from any website by activating the setting on your browser that allows you to refuse the setting of some or all cookies. However, if you block all cookies you may not be able to access all or part of our website or use some features of our website. You can also use your browser settings to delete cookies. For more information about cookies please visit <https://ico.org.uk/your-data-matters/online/cookies/>

### ***Your rights***

You have the following rights under data protection legislation. If you have any questions about your rights, or you wish to exercise any of these rights, please email [legal@110industries.com](mailto:legal@110industries.com).

We may require you to provide forms of identity should you wish to exercise one of your rights below.

**Access:** You are entitled to confirmation that we process your personal data and a copy of such personal data.

**Rectification:** If the personal data we hold about you is incorrect, you have the right for this to be rectified. You may also update your personal data through your account settings.

**Erasure:** You can request us to erase your personal data if there is no compelling reason to continue processing.

**Restriction:** You may request a restriction on the processing we undertake on your personal data. This will only apply if we have no lawful basis to process your personal data, your personal data is inaccurate or to comply with an objection request (see below).

**Objection:** You may object to our processing of your personal data if our processing is carried out on the basis of legitimate interests. Please note, however, that should we determine that our interests are so compelling as to override your objection we may continue to process your personal data.

You may object to receiving direct marketing at any time.

**Portability:** You have the right to receive some of your personal data in machine readable format. This right extends to you being able to request that such data is sent to a third-party controller.

**Withdrawing consent:** If the lawful basis we rely on to process your personal data is consent you have the right to withdraw this consent. Please email [legal@110industries.com](mailto:legal@110industries.com) to withdraw consent for the

processing of your personal data.

Complaining to a supervisory authority: Further information about your rights can also be obtained from your national data protection regulator – in Sweden, this is the Swedish Authority for Privacy Protection (<https://www.imy.se/en/>). If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with your national data protection supervisory authority, although we would ask that you contact us in the first instance.

Your right to be informed: You can contact us to find out more or to ask any questions you may have about our use of your personal data.