

# PRIVACY POLICY

## Winter Fell

Last updated: october 2017

**Winter Fell**("Winter Fell", "We" or "Us") respects your privacy and is dedicated to protecting the privacy of those persons using ("User(s)" or "You") Winter Fell's mobile games, Winter Fellwebpages, Winter FellPublishing Portal, Winter FellDeveloper Center and other services provided by Winter Fell on a mobile or other platform ("Services"). This Privacy Policy helps You to understand what personal information/data ("Personal Information") and non-personal information We collect, and how We use it.

This Privacy Policy applies to your use of the Services and You should read this document before using the Services. This Privacy Policy is incorporated into and is subject to the Winter FellTerms of Service. If You do not agree to the terms of this Privacy Policy, you may not use the Services.

If You are under 13, please do not attempt to access or take in use our Services (if not explicitly otherwise stated in the relevant service) or send any information about yourself to Us. Winter Fellwill not knowingly collect Personal Information from anyone under the age of 13. If you are a minor in your country of residence, please seek parental consent before using the Services. If You believe that we might have any information from or about a child under the age of 13, please contact us at [hososbela@gmail.com](mailto:hososbela@gmail.com).

"Personal Information" refers to information, which allows an User to be specifically identified as an individual person. We may also collect "non-personal information" meaning it can't be used to specifically identify anyone. Non-personal information may also result from removing the personally identifiable parts from Personal Information. We collect and use both types of information and combinations of both types.

Winter Fellshall not be responsible for the actions of third parties (including people, companies or services), the content of third-party websites, the usage of the information provide by User to such third parties, or any products or services they may offer.

- **Processing Personal Information**

Winter Fellwill only collect such Personal Information that is relevant for the purposes described in this Privacy Policy.

Personal Information may be processed for the purposes of creating Services accounts, using, maintaining, customizing and developing the Services,

contacting Users, user verification, providing services, sending customer and marketing information to Users, enabling communication in the Services, conducting research, creating reports, offering competitions and sweepstakes, allowing game developers to contact Winter Felland receive feedback on their games and allowing game developers to receive feedback and metrics on their games published by Winter Fell.

We may also use collected information to create an user profile link or combine it with other information we get from third parties, to help understand your preferences and provide You with better services and identify and suggest connections with other users. Personal Information may also be used to provide customer service and other services at your request, to send You information, including confirmations, invoices, technical notices, updates, security alerts, and

support messages, as well as communicate with You about promotions and other news about products and services offered by Winter Fell.

Winter Fell commits to adhere to the provisions of the Finnish Personal Data Act and other applicable laws and regulations pertaining to processing of Personal Information, as well as to process Personal Information in compliance with good processing practices. All personnel processing Personal Information are obliged to keep such information strictly confidential.

- **Information We may Collect and Sources of Information**

We collect several categories of information:

- Information You give to us
- Technically gathered information when You use our Services
- Information from third parties (such as Facebook and Twitter) in relation to our service.

We may collect information that You give to us, for example when You sign up to use our Services (in the Service or via third party login/connect). This information may include your name, unique username, pictures of yourself, e-mail address, date of birth, phone number, phone contacts.

We may use technical means to collect information about You when You use our Services. This information may include your Internet Protocol address, time of your requests or actions in the service, mobile device ID, hardware type and operating system version, operating system, access times, browser type and language, location based on Internet Protocol ("IP") address or Global Positioning System (GPS), advertising ID, media access control ("MAC") address, international mobile equipment identity ("IMEI"), your device name, your email address (if You have connected e.g. to Facebook or Google+), and referring website addresses.

We may allow You to connect the Service to your social media account(s) such as through Facebook Connect, Apple's Game Center or any other third party service to obtain information about You when You consent to allow your social networking site to make that information available to Winter Felland, consequently Winter Fellmay be able to collect certain information from your social networking profile when your social networking site permits to make that information available. In such case we may collect Personal Information, such as your user ID, name, e-mail address, and profile picture that are available in your public profile with such third party, and content such as posts, comments, media, and applications. You may be able to control the types of personal data available in the profile of such third party services by adjusting the privacy settings available therein.

Winter Fellmay collect non-personal information on Users' activities in the Services, such as the amount of levels completed and the length of time played, interactions with other players and other interactions with a game or website.

In order to improve the Services Winter Fellmay collect and use non-personal information. Winter Fellmay also use third party service providers to collect and use non-personal information. Information such as time of visit, pages visited, time spent on each page of the Site, your Internet Protocol (IP) address, and the type of operating system used in the devices used to access.

In addition to, as an element of the Services, we also use other third party data analytics service providers, such as Google Analytics, Flurry, Game Analytics, Facebook Audience Network, which help us analyze and improve our games. The data collected by data analytics service providers

enables us to understand usage of the Services. Usage information and Personal Information are stored by such service providers and are subject to their privacy policies. The current list of data analytics service providers We use in connection with the Services can be requested from Us at any time by contacting Us at [reaganaanyabryant@outlook.com](mailto:reaganaanyabryant@outlook.com).

- **Disclosing and Hosting Information**

By using the Services You always disclose information about yourself to Winter Fell. In connection with your use of the Services, including uploading user generated content into the Services, or through any communication in the Services, You may disclose data about yourself to other users, and any such data should be considered public information with no expectation of privacy. Winter Fellis not responsible for any Personal Information You choose to make public in the Services. By default, the information You send to a recipient is only viewable

to that specific recipient unless You specify other recipients or choose to make it otherwise public.

Winter Fell will not disclose your stored Personal Information to third parties for direct marketing, market research, polls or public registers without your consent or except as part of a specific program or feature for which You will have the ability to opt-in or opt-out. Winter Fell shall not be responsible for any processing of Personal Information by third parties. The Personal Information might be used for targeted in-service marketing and other similar purposes, and upon your consent, to email marketing by Winter Fell and selected third- parties.

We may use external service providers to provide technical solutions or services for processing stored information and access the stored information by using a technical interface and share your personally information with third party service providers to the extent that it is reasonably necessary to perform, improve or maintain the Services. We may use third party service providers, such as e-mail service providers, credit card processors, information analyzers and business intelligence providers. Winter Fell has right to share Personal Information as necessary for the aforementioned service providers to provide their services to Winter Fell. Winter Fell is not liable for the acts and omissions of these third parties.

We may share non-personal information (such as anonymous User usage data, referring / exit pages and URLs, platform types, asset views, number of clicks, etc.) with interested third-parties to assist them in understanding the usage patterns for certain content, services, advertisements, promotions, and/or functionality of the Services. In exceptional circumstances Personal Information may be disclosed to third parties if required under any applicable law or regulation or order by competent authorities, or in order to enforce the Terms of Service and to investigate possible infringing use of the Services as well as to guarantee the safety of the Services.

Winter Fell does not use or disclose to third parties any Personal Information or non-personal information of minors for the purposes of advertising. Winter Fell does its best effort to prevent

any unsolicited or inappropriate advertisement through the Services. If you have received any unauthorized or inappropriate advertisement through the Services we request You to contact support(at)Winter Fell.net.

Winter Fell may share your information in connection with any merger, sale of our assets, or a financing or acquisition of all or a portion of our business. Aggregate or anonymous information about You may be shared with advertisers, publishers, business partners, and other third parties.

- **Protection of Information**

The registers will be maintained in external service providers' servers with appropriate safeguards, such as password protection, granting the access to the

stored information only to persons working at Winter Fellor Winter Fellpartners who are expressly authorized by Winter Fell. The register is protected by appropriate industry standard, technical and organisatory safety measures. Although We make good faith efforts to store the information collected on the services in a secure operating environment that is not available to the public, We cannot guarantee the absolute security of that information during its transmission or its storage on our systems. Winter Fellwill post a notice on the Winter Fellwebsite or through the Services in case material security breach that endangers your privacy or Personal Information. Winter Fellmay also temporarily shut down a service to protect Personal Information.

- **Cookies and Tracking Technologies**

A cookie is a string of information or a small text file that a website stores on a visitor's device, and that the visitor's browser or operating system provides to "remember" things about your visit. Winter Fellmay use cookies to help it identify and track visitors, their usage of the Services, and their access preferences, improving quality, tailoring recommendations, and developing the Services. The cookies will not enable Winter Fellto access and review information stored on a User's computer. In addition to cookies, Winter Fellmay use other existing or later developed tracking technologies. These tracking technologies may set, change, alter or modify settings or configurations on your device.

Winter Fellmay work with third parties who use cookies and other tracking technologies to track the effectiveness of the advertisements that may be placed in the Services. They are used for analyzing advertisement view counts, and are not linked to your Personal Information. They might also allow the advertiser to tailor advertising to you when you visit other websites, and/or set, change, alter or modify settings or configurations on your device.

Users who do not wish to have cookies placed on their computers should set their devices to refuse cookies or tracking before using the Services, with the drawback that certain features of such service may not function properly.

Please note that some parts of the Services may be country specific, and may not work properly if Winter Fellis unable to tell where You are accessing the Services from.

- **Information on the processing of Personal Information**

Users are entitled to review any information collected on him/her and stored in the register. When User wishes to use the above right to review stored information, User should send a signed request thereof to Winter Fellusing the

contact details below. We will, at our own initiative or upon a User's request, complement, correct or delete incomplete, inaccurate or outdated Personal Information.

You may opt-out of receiving promotional emails by following the instructions in those emails. If You opt-out, Winter Fellmay still send You non- promotional customer information, such as emails about your account, providing the Service or Winter Fell's ongoing business relations.

- **Changes to the Privacy Policy**

Winter Fellmay change this Privacy Policy from time to time, and at Winter Fell's sole discretion. All changes hereto will be made available on this website, which is why Winter Fellen encourages Users to frequently check this page for any changes to this Privacy Policy. Changes hereto will not prejudice Users' rights without their consent.

- **Contact Information**

The User may at any time contact Winter Fellat the address here below.

**Winter Fell**

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