

GTFO

Privacy Policy

Last Updated: 3 November 2023

Thank you for using our products and services! We respect your concerns about privacy and appreciate your trust and confidence in us.

Here is a summary of the information contained in this privacy policy ("**Privacy Policy**"). This summary is to help you navigate the Privacy Policy and it is not a substitute for reading everything! You can use the hyperlinks below to jump directly to particular sections.

What information do we need to provide the Game

If you register an account to use the Game then we will need some information from you to set this up. If you choose, you can provide certain other information to personalise your experience of the Game, enable Game features or participate in the Game. If you need to get in touch with us, we will retain some information so that we can get back in touch with you and address any concerns. [More Information](#).

How will we use your information?

We use your information to provide the many functions and services that comprise the Game. We also use your information for account verification and to support and improve the Game. We do not share your information with any third parties, except where we need to in order to provide the Game (e.g., if you choose, you can record data on online community platforms or to back up your data; use our affiliates around the world to help us to deliver the Game) or monitor the success of our marketing and advertising programs, or where we are instructed to by a court, authority or compelled by law. [More Information](#).

Who do we share your information with?

We use some third parties to help us deliver the best possible experience (e.g., cloud services to back up your data and support services, analytics providers to carry out data analytics). When we use a third party, we only do this to process or store your information for the purposes described in this Privacy Policy. We also have affiliates around the world who help us deliver the Game and we may be required by a court or legal obligation to disclose certain information in some circumstances. [More Information](#).

Where do we process your information?

Our servers are located in Sweden. Your information can be accessed from outside of where you live by our support, engineering and other teams around the world, including Sweden and the United States. [More Information](#).

How long do we keep hold of your information?

We generally retain your information for the period during which you maintain an account for the Game, or until account deletion in accordance with your request, after which your data is deleted (as further described in this Privacy Policy), unless otherwise required by applicable laws. [More Information](#).

How can I exercise my rights over my information?

Depending on where you are, you may have certain rights with respect to your information, such as rights of access, to receive a copy of your data, or to delete your data or restrict or object to our processing of your data. [More Information](#).

How to get in touch with us

If you have any questions about anything in this Privacy Policy, or want to exercise any rights you may have, please contact us [here](#).

How will we notify you of changes?

Changes to this Privacy Policy will be posted here. Please check this page frequently to see if there are any updates or changes to this Privacy Policy. [More Information](#).

Contact Information

Data Controller: 10 Chambers AB Email: privacy@10chambers.com

Welcome to GTFO!

This Privacy Policy explains the *when, how* and *why* when it comes to the processing of your personal information in connection with GTFO (the “**Game**”) and sets out your choices and rights in relation to that information. Please read it carefully – it is important for you to understand how we collect and use your information, and how you can control it.

If you do not agree to the processing of your personal information in the way this Privacy Policy describes, please do not provide your information when requested and stop using the Game. By using the Game you are acknowledging our rules regarding your personal information as described in this Privacy Policy.

This Game has been developed by 10 Chambers AB (“**we**”, “**us**”, “**our**”).

For the purpose of data protection laws, the data controller of your personal information in relation to the Game is 10 Chambers AB. The registered address of 10 Chambers AB is Drottninggatan 95A, 113 60 Stockholm, Sweden.

Please reach out to us if you have any questions or concerns regarding the processing of your personal information. You can contact us anytime at privacy@10chambers.com.

1. The Types of Personal Information We Use

This section describes the different types of personal information we collect from you and how we collect it. If you would like to know more about specific types of data and how we use that data, please see the section entitled “*[How We Use Your Personal Information](#)*” below.

The following is a high-level summary of the types of personal information we use:

1. Information you provide to us (either directly or through a third party).

- **Account registration information:** You give us information about you when you set up an account to register for the Game: information we import from your connected Steam account in order to set up your profile, including your name as it appears on Steam and your Steam ID.
- **Customer support and feedback information:** Email address and the content of your support request.
- **Email address:** If you provide us your email address to receive newsletters with your consent.

2. Information about you generated as part of the Game

We automatically collect certain data from you when you use the Game, namely:

- your Game data, including PlayFab ID, game data including login information, game play information; IP address, device information, including device ID, platform and information regarding your use of the Game, such as play statistics (e.g. level and scores);
- each time you interact with us, for example, if you contact our support team, we collect information including your email and the content disclosed in the email;
- information regarding your engagement with our advertising efforts, including technical identifiers, location, communication data, metadata and Cookie ID;

- information to analyse the performance of our marketing efforts and the Game, including your IP address, sales and usage data, technical information, technical identifiers, engagement information and contact information.

2. Cookies

We use cookies and other similar technologies (e.g. web beacons, log files, scripts and eTags) (“**Cookies**”) to enhance your experience using the Game. Cookies are small files which, when placed on your device, enable us to provide certain features and functionalities.

For more information about our Cookies policy, click [here](#).

3. Children

Children must not use the Game for any purpose, except where their parent or guardian has provided consent (to the extent this option is available in your jurisdiction).

By children, we mean users under the age of 18 years old; or in the case of a region where the minimum age for processing personal information differs, such different age. For users located in certain regions we have listed the relevant minimum age in the table below.

Region in which the user is located	Minimum age of the user
Australia	18
European Economic Area (Germany and France only)	16
Japan	18
Republic of Korea	14
United Kingdom	13
United States	13

We do not knowingly collect personal information from children under these ages for any purpose. If you believe that we have personal information of a child under these ages without parental/guardian consent, or if you are the parent or guardian of the user and wish to withdraw consent, please contact us at privacy@10chambers.com and we will delete such information.

4. How We Use Your Personal Information

This section provides more detail on the types of personal information we collect from you, and why. For users who live in the United Kingdom, Germany or France (“**Relevant Jurisdiction**”), it also identifies the legal basis under which we process your data.

Personal Information	Use	Legal Basis (only relevant if you are located in a Relevant Jurisdiction)
<i>Information you provide to us (either directly or through a third party)</i>		
Account Creation: Steam ID, Steam username, PlayFab ID, hashed IP address, city, country.	We use this information to create and verify your account for the Game, and to allow you to log in, in accordance with your request.	Necessary to perform our contract with you to provide the Game.
Friend's Lists: Steam ID, Playfab ID,	We use this information to improve the functionality of our game by seeing who is playing GTFO.	It is in our legitimate interest to use this information to improve the functionality of our game.
<i>Information generated as part of the Game</i>		
Game data including login information (Microsoft Azure PlayFab): Steam ID, Steam nickname, IP address, city and country, game play data, levels, scores, completion of game, vanity items	We use this information to provide you with feedback and information about your gameplay and progress.	Necessary to perform our contract with you to provide the Game.
Game data including login information (Unity Analytics): Unity User ID (an anonymized ID), country and city, actions taken within game, play session information, operating system, Unity Player and Unity editor versions, app ID of game installed	We use this information for analytics purposes.	It is in our legitimate interest to use this information to conduct data analytics to further develop and improve the Game.
Game data and login information (Unity Cloud Diagnostics): operating system and version, CPU, graphic card information, system language, device manufacture and model, RAM, Unity Player and Unity Editor versions, app ID of game, screen resolution	We use this information for diagnostics purposes.	It is in our legitimate interest to use this information for diagnostic purposes for crash and exception reporting in order to ensure the functionality of the Game.
Game and login data Game Analytics): operating system, platform (steam), timestart, game play data such as levels, scores, actions within the game, play session information, vanity items, voice language chosen for matchmaking	We use this information for analytics purposes.	It is in our legitimate interest to use this information to conduct data analytics to further develop and improve the game.

Advertising and marketing campaigns: technical identifiers, location, communication data, metadata, Cookie ID, IP-address, mobile device ID, ISP ID, device type, operating system and version, browser and version, referrer URL, site visit data	We use this information to monitor our advertising and marketing campaigns.	We use this information with your consent.
Chat Data and Game Status: Free Chat (users can communicate using their own, custom messages) and audio chat (for users located in the EEA or Switzerland, both chat functions are only available to users over the age of 16) Please note that this data is only stored on your device and is not processed by our servers	We facilitate the posting of your communications and sharing of your in-game status with other users.	Necessary to perform our contract with you to provide chat functionality within the Game.
Customer support: email address and the content of your support request	We use this information to: <ul style="list-style-type: none"> • improve our services; and • provide troubleshooting, such as addressing and remediating technical issues and bugs. 	Necessary to perform our contract with you to provide and support the Game.
Newsletter: email address	We use this information to provide you with our newsletter.	We use this information with your consent.
Marketing analytics data (Google Analytics): Technical information and identifiers, engagement information and contact information	We use this information to monitor the success of our advertising and marketing programs. If you click on a link or interact with content that advertises the Game, we store certain marketing analytics data with your profile.	We use this information with your consent.
Marketing (social media): social media user account information and comments from such accounts on our social media content	We use this information to centrally manage our social media platforms.	We use this information with your consent.
Marketing analytics data: IP address, sales and usage data (i.e., information about how	This information is used to create a fingerprint. Fingerprints are built	We use this information with your consent.

data subject interacts with the game and marketing activities)	and hashed into an anonymous identifier. We use this information to monitor the success of our advertising and marketing programs.	
Marketing attribution data: IP address, anonymized user ID, timestamp, OS version, screen resolution, time-zone, system language, and in-game events, Steam platform data	We use this information to analyse the performance of our marketing efforts and the Game.	We use this information with your consent.

5. How We Store and Share Your Personal Information

Our corporate group operates around the world. Pursuant to our contract with you to provide you with the Game, your personal information will be processed on servers that may not be located where you live. No matter where our servers are located, we take appropriate measures to safeguard your rights in accordance with this Privacy Policy. Our servers for the Game are located in Sweden. We also have support, engineering and other teams who may support the Game including from Sweden and the United States.

Only where necessary will we share your personal information with third parties. Situations where this occur are:

- **Third parties** that provide services in support of the Game, including providers for the purpose of processing support ticket ID and support communication, managing our social media platforms, processing gameplay and game rendering data to provide game analytics to improve gameplay, and for the purpose of providing marketing and advertisements and monitor the success of our marketing and advertising programs. All companies providing services for us are prohibited from retaining, using, or disclosing your personal information for any purpose other than providing us with their services.
- **Companies within our corporate group** who process your personal information in order to operate the Game. All related group companies may only use your personal information in accordance with this Privacy Policy.
- **Regulators, judicial authorities and law enforcement agencies, and other third parties for safety, security, or compliance with the law.** There are circumstances in which we are legally required to disclose information about you to authorities, such as to comply with a legal obligation or processes, enforce our terms, address issues relating to security or fraud, or protect our users. These disclosures may be made with or without your consent, and with or without notice, in compliance with the terms of valid legal process such as a subpoena, court order, or search warrant. We are usually prohibited from notifying you of any such disclosures by the terms of the legal process. We may seek your consent to disclose information in response to a governmental entity's request when that governmental entity has not provided the required subpoena, court order, or search warrant. We may also disclose your information to:
 - enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;

- detect, prevent or otherwise address security, fraud or technical issues; or
- protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).
- **A third party that acquires all or substantially all of us or our business.** We may also disclose your information to third parties if we either: (a) sell, transfer, merge, consolidate or re-organise any part(s) of our business, or merge with, acquire or form a joint venture with, any other business, in which case we may disclose your data to any prospective buyer, new owner, or other third party involved in such change to our business; or (b) sell or transfer any of our assets, in which case the information we hold about you may be sold as part of those assets and may be transferred to any prospective buyer, new owner, or other third party involved in such sale or transfer.

6. The Security of Your Personal Information

We are committed to maintaining the privacy and integrity of your personal information no matter where it is stored. We have information security and access policies that limit access to our systems and technology, and we protect data through the use of technological protection measures such as encryption.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will implement and maintain reasonable measures to protect your personal information, we cannot guarantee the security of the information transmitted through the Game or otherwise via the Internet; any transmission is at your own risk.

7. Data Retention

We do not keep your data for longer than is necessary unless we are required to do so under law. For further details on how long we keep your data, please refer to the time periods set out below.

Personal Information	Retention Policy
Steam ID, Steam username, PlayFab ID, city, country	Stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request upon which it will be deleted within 30 working days).
Game data and play statistics (Microsoft Azure PlayFab, Unity Analytics, Unity Cloud Diagnostics, Discord)	
Advertising and marketing campaigns	
Marketing analytics data	
Customer support data	
Marketing (social media) information	
Marketing (technical data) information	
Steam friends lists	This data is not permanently stored and is only processed for matchmaking purposes.
Chat Data	This data is not permanently stored on servers, and is only processed to ensure messages are

	delivered to your device. All chat data is thereafter only stored on your device.
Newsletter	Until unsubscribing from the newsletter upon which the information will be deleted within 30 working days or otherwise stored for the lifetime of your use of the Game (i.e. until account deletion in accordance with your request upon which it will be deleted within 30 working days).
Marketing attribution information	Stored for 14 months, or deleted within 30 working days upon your account deletion request.

If we are required to retain your information beyond the retention periods set out above, for example to comply with applicable laws, we will store it separately from other types of personal information.

8. Your Rights

Some jurisdictions' laws grant specific rights to users of the Game, which are set out in this section.

This section entitled "Your Rights" applies to users that are located in the Relevant Jurisdictions. If you are located in a territory outside a Relevant Jurisdiction, please refer to the Supplemental Jurisdiction-Specific Terms for an overview of your rights and how these can be exercised.

The sub-section entitled "Advertising" also apply to users that are located in Japan, Korea, United States and Australia.

You have certain rights in relation to the personal information we hold about you, depending on where you are located. Some of these only apply in certain circumstances (as set out in more detail below). We must respond to a request by you to exercise those rights without undue delay and at least within one month (though this may be extended by a further two months in certain circumstances). To exercise any of your rights, please contact us at privacy@10chambers.com.

Access

You have the right to access personal information we hold about you, how we use it, and who we share it with. You can access the personal information you have made available as part of your account by logging into your account. If you believe we hold any other personal information about you, please contact us at privacy@10chambers.com.

Portability

You have the right to receive a copy of certain personal information we process about you. This comprises any personal information we process on the basis of your consent (e.g., information collected to provide our newsletter) or pursuant to our contract with you (e.g., account name), as described above in the section "[How We Use Your Personal Information](#)". You have the right to receive this information in a structured, commonly used and machine-readable format. You also have the right to request that we transfer that personal information to another party, with certain exceptions. We will provide further information to you about this if you make such a request.

If you wish for us to transfer such personal information to a third party, please ensure you detail that party in your request. Note that we can only do so where it is technically feasible. Please note that we may not be able to provide you with personal information if providing it would interfere with another's rights (for example, where providing the personal information we hold about you would reveal information about another person or our trade secrets or intellectual property).

Correction

You have the right to correct any of your personal information we hold that is inaccurate. You can access the personal information we hold about you by logging into your Game account. If you believe we hold any other personal information about you and that information is inaccurate, please contact us at privacy@10chambers.com.

Erasure

You can delete your account, or remove certain personal information, by logging into your Game account. If there is any other personal information you believe we process that you would like us to erase, please contact us at privacy@10chambers.com.

We may need to retain personal information if there are valid grounds under data protection laws for us to do so (for example, for the defence of legal claims or freedom of expression) but we will let you know if that is the case. Where you have requested that we erase personal information that has been made available publicly on the Game and there are grounds for erasure, we will use reasonable steps to try to tell others that are displaying the personal information or providing links to the personal information to erase it too.

Restriction of Processing to Storage Only

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection laws for us to do so (for example, for the defence of legal claims or for another's protection). As above, where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing it too.

Objection

You have the right to object to our processing of your personal information. We will consider your request in other circumstances as detailed below by contacting us at privacy@10chambers.com.

To the extent provided by applicable laws and regulations, you may withdraw any consent you previously provided to us for certain processing activities by contacting us at privacy@10chambers.com. Where consent is required to process your personal information, if you do not consent to the processing or if you withdraw your consent we may not be able to deliver the expected service.

Announcements

We may from time to time send you announcements when we consider it necessary to do so (for example, when we temporarily suspend access to the Game for maintenance, or security, privacy or administrative-related communications). You may not opt-out of these service-related announcements, which are not promotional in nature.

Advertising

You may choose to stop receiving personalised advertising or marketing promotions from us when using the Game by contacting us at privacy@10chambers.com.

9. Contact & Complaints

Any questions, comments and requests regarding this Privacy Policy should be addressed to privacy@10chambers.com.

In the event that you wish to make a complaint about how we process your personal information, please contact us in the first instance at privacy@10chambers.com and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the data protection authority in the region in which you live or work where you think we have infringed data protection laws.

10. Changes

If we make any changes to this Privacy Policy we will post the updated Privacy Policy here. Please check this page frequently to see if there are any updates or changes to this Privacy Policy.

11. Language

Except as otherwise prescribed by law, in the event of any discrepancy or inconsistency between the English version and local language version of this privacy policy, the English version shall prevail.

INFORMATION FOR PARENTS

Before your child can play the Game, you will need to provide your consent to approve your child's account set-up and the processing of their personal information.

What personal information does the Game process?

The Game is a survival first-person cooperative game.

If your child successfully signs up to the Game, this will result in the collection and sharing of certain personal information:

- Steam ID, Steam username, PlayFab ID, hashed IP address, city, country;
- **Game data, including login information (Microsoft Azure PlayFab):** such as Steam ID, Steam nickname, IP address, city and country;
- **Game data including login information (Unity Analytics):** such as Unity User ID (an anonymized ID), country and city, actions taken within game, play session information;
- **Game data and login information (Unity Cloud Diagnostics):** such as operating system and version, CPU, graphic card information, system language, device information;
- **Advertising and marketing campaigns:** such as technical identifiers, location, communication data, metadata, Cookie ID, IP-address;
- **Chat data;**
- **Customer support data:** email address and content of support request;
- **Newsletter data:** email address;
- **Marketing analytics data (Google Analytics):** technical information and identifiers, engagement information and contact information;
- **Marketing (social media):** social media user account information and comments from such accounts on our social media content;
- **Marketing analytics data:** IP address, sales and usage data; and
- **Marketing attribution data:** IP address, anonymized user ID, timestamp, OS version, screen resolution, time-zone, system language, and in-game events, Steam platform data.

You can review our Privacy Policy for more details on what personal information we collect and how we use and process the information.

Why is my consent required?

Certain jurisdictions require or recommend the consent of a parent or legal guardian before their child can sign up to a game such as the Game, where personal information will be processed. If you do not consent, or withdraw your consent, we will immediately delete any personal information collected up to that point.

What if there are changes to the Game in the future?

If we make any changes to the way their personal information is processed, we will notify you of those changes. You must consent to those changes before your child's personal information will be processed for that new purpose.

Will you retain my personal information?

We will keep a record of your email address so that we can notify you of any changes to the processing of your child's personal information, and so that we know you are a parent or legal guardian of a player when you contact us. As mentioned above, your credit card information is not processed by us, but instead only processed by a third party payment processor. We do not have access to your credit card information.

What if I do not consent?

If you do not consent (including by providing your credit card details for verification) then your contact information will be deleted.

How do I withdraw my consent or delete my child's account?

You can withdraw your consent or delete your child's account by emailing us at privacy@10chambers.com. You can also request a copy of your child's personal information at any time.

SUPPLEMENTAL TERMS – JURISDICTION-SPECIFIC

Some jurisdictions' laws contain additional terms for users of the Game, which are set out in this section.

If you are a user located in one of the jurisdictions below, the terms set out below under the name of your jurisdiction apply to you in addition to the terms set out in our Privacy Policy above.

Australia

We take reasonable steps to ensure that third party recipients of your personal information located outside Australia handle your personal information in a manner that is consistent with Australian privacy laws. However, you acknowledge that we do not control, or accept liability for, the acts and omissions of these third party recipients.

You have the right to access personal information we hold about you, how we use it, and who we share it with. You have the right to correct any of your personal information we hold that is inaccurate.

If you are under the age of 18, you undertake that you have the consent of your parent or legal guardian to register an account on and use the Game.

Where practicable, we will give you the option of not identifying yourself or using a pseudonym when registering an account on or using the Game. You acknowledge that if you do not provide us with your personal information, we may be unable to provide you with access to certain features or sections of the Game, including social media integration and in-Game purchases.

If you are dissatisfied with our response to your request for access to, or correction of, your personal information or your privacy complaint in respect of your personal information, you may contact the Office of the Australian Information Commissioner (Telephone: +61 1300 363 992 or email: enquiries@oaic.gov.au).

California

This section applies to California residents covered by the California Consumer Privacy Act of 2018 ("CCPA").

Collection and Disclosure of Personal Information

Over the past 12 months, we have collected and disclosed the following categories of personal information from or about you or your device:

- Identifiers, such as login information, PlayFab ID, IP address, device ID, device token, email address, and nickname. This information is collected directly from you and your device and from social media platforms if you choose to sign up using a social media account (Steam).
- Internet or other electronic network activity information, such as your information regarding your use of the Game, date and time stamps of actions, log-in and clickstream data and other device Information as described in the main Privacy Policy. This information is collected directly from you and your device.
- Customer support data.
- Marketing, analytics and ad attribution data.

- Other information described in subdivision (e) of Section 1798.80, including information about your gender, nationality, or age. This information is collected directly from you in the context of being our consumer.

We collect your personal information for the following purposes:

- To provide you with the Game, maintain your account and provide customer services.
- To improve our services, including the functionality of the Game.
- To carry out analytics and measure our marketing efforts.

For additional information about what each type of personal information is used for, see **Section 4 How We Use Your Personal Information**.

We disclose personal information to the following types of entities:

- Other companies within our corporate group who process your personal information in order to operate the Game.
- Other companies that provide services on our behalf in support of the Game and who are prohibited by contract from retaining, using, or disclosing personal information for any purpose other than for providing their services to us.
- Regulators, judicial authorities and law enforcement agencies
- Entities that acquire all or substantially all of our business.

In the past 12 months, we have not sold Personal Information of California residents within the meaning of “sold” in the CCPA.

Rights under the CCPA:

If you are a California resident, you have the right to:

- Request we disclose to you free of charge the following information covering the 12 months preceding your request:
 - the categories of personal information about you that we collected;
 - the categories of sources from which the personal information was collected;
 - the purpose for collecting personal information about you;
 - the categories of third parties to whom we disclosed personal information about you and the categories of personal information that was disclosed (if applicable) and the purpose for disclosing the personal information about you; and
 - the specific pieces of personal information we collected about you;
- Request we delete personal information we collected from you, unless CCPA recognises an exception; and
- Be free from unlawful discrimination for exercising your rights including providing a different level or quality of services or denying goods or services to you when you exercise your rights under the CCPA.

We aim to fulfil all verified requests within 45 days pursuant to the CCPA. If necessary, extensions for an additional 45 days will be accompanied by an explanation for the delay.

How to Exercise Your Rights

First, you may wish to log into your account and manage your data from there. If you are a California resident to whom the CCPA applies, you may also exercise your rights, if any, regarding other data by contacting us at privacy@10chambers.com.

Japan

If you are under the age of 18, you must obtain your parent's or legal guardian's consent to register an account on and use the Game.

By clicking "accept", you consent to the transfer of your personal information to third parties (if any), which may include the cross-border transfer of your information to any country where we have databases or affiliates and, in particular, to the jurisdictions specified in **Section 5 How We Store and Share Your Personal Information**.

The categories of personal information specified to the jurisdictions in **Section 5 How We Store and Share Your Personal Information** may include "special care-required personal information" (i.e., sensitive information as detailed under applicable law), and you consent to the collection of such information.

You may request us to notify you about the purposes of use of, to disclose, to make any correction to, to discontinue the use or provision of, and/or to delete any and all of your personal information which is stored by us, to the extent provided by the Act on the Protection of Personal Information of Japan. When you wish to make such requests, please contact us at privacy@10chambers.com.

Republic of Korea

Provision of personal information to third parties

We provide your personal information to third parties as described below:

<i>Name of Recipient (and contact information)</i>	<i>Types of Personal Information provided</i>	<i>Purpose of Use by Recipient</i>	<i>Period of Retention and Use by Recipient</i>
Microsoft Azure PlayFab https://privacy.microsoft.com/en-us/privacystatement	Steam ID, Steam username, PlayFab ID, city and country, IP address (partially disguised), gameplay data, levels, scores, game status, items	For account creation, verification and log-in. To process Game data.	In accordance with the Microsoft Azure PlayFab privacy policy.
Google Analytics https://policies.google.com/privacy	Technical information, technical identifiers, engagement information and contact information.	To monitor the success of our advertising campaigns.	In accordance with the Google Developer License Agreement and privacy policy.
Omnicom Media Group AB (OMD) https://omnicommediagroup.com/privacy-notice/	Technical identifiers, location, communication data, metadata, Cookie ID, IP-address, mobile device ID, ISP ID, device type, operating system and version, browser and version, referrer URL, site	For advertising purposes.	In accordance with the Omnicom Media Group AB privacy policy

	visit data		
Unity Analytics (https://unity3d.com/legal/privacy-policy)	Unity User ID (an anonymized ID), country and city, actions taken within game, play session information, operating system, Unity Player and Unity editor versions, app ID of game	To carry out data analytics.	In accordance with the Unity Analytics privacy policy.
Unity Cloud Diagnostics (https://unity3d.com/legal/privacy-policy)	Operating system and version, CPU, graphic card information, system language, device model, RAM, Unity Player and Unity Editor versions, app ID of game, screen resolution	For diagnostics purposes and to ensure the functionality of the Game.	In accordance with the Unity Cloud Diagnostics privacy policy.
Mailchimp (https://mailchimp.com/legal/privacy/)	Email address, service usage data such as IP address, operating system, browser ID, viewfinder size, system and connection information, log data and usage data, demographic information, device information, location and online engagement data	For sending newsletters.	In accordance with the Mailchimp privacy policy
Hootsuite (https://www.hootsuite.com/legal/general-data-protection-regulation)	Name, photos, age, gender, geographic location, opinions, preferences, and phone numbers that are provided or posted by social media users.	To manage social media platforms centrally.	In accordance with the Hootsuite privacy policy
GameSight (https://console.gamesight.io/privacy-policy)	Marketing attribution data	To analyze the performance and marketing efforts of the Game.	In accordance with the GameSight privacy policy

Overseas Transfer of Personal Information

We transfer personal information to third parties overseas as follows:

Recipient (Contact Information of Information Manager)	Country to which Your Personal Information is to be Transferred	Date and Method of Transfer	Types of Your Personal Information to be Transferred	Purposes of Use by Recipients	Period of Retention of Use by Recipient
Microsoft Azure PlayFab https://privacy.microsoft.com/en-us/privacystatement	United States	Transmitted from time to time	Steam nickname and Steam ID	For account creation, verification and log-in. To process Game data.	In accordance with the Microsoft Azure PlayFab terms
Google Analytics https://policies.google.com/privacy (United States unless otherwise described in the service provider's privacy policy)	United States	Transmitted from time to time	Engagement data, including watching action, activeness, log in status will be transferred to Google for targeting marketing campaigns Ad ID	To monitor the success of our advertising campaigns.	In accordance with the Google Analytics terms
Omnicom Media Group AB (OMD) https://omnicommediagroup.com/privacy-notice/	United States	Transmitted from time to time	Site visit data from 10Chambers website: cookie ID, IP-address, mobile device ID, ISP ID, device type, operating system and version, browser and version, referrer URL, email address	For advertising purposes.	In accordance with the OMD terms
Mailchimp https://mailchimp.com/legal/privacy/	United States	Transmitted from time to time	Email address	For sending. Newsletters.	In accordance with the Mailchimp terms

Unity Analytics https://unity3d.com/legal/privacy-policy	United States	Transmitted from time to time	Unity User ID (an anonymized ID), country and city, actions taken within game, play session information, operating system, Unity Player and Unity editor versions, app ID of game	To carry out data analytics.	In accordance with the Unity Analytics terms
Unity Cloud Diagnostics https://unity3d.com/legal/privacy-policy	United States	Transmitted from time to time	Operating system and version, CPU, graphic card information, system language, device model, RAM, Unity Player and Unity Editor versions, app ID of game, screen resolution	For diagnostics purposes and to ensure the functionality of the Game.	In accordance with the Unity Cloud Diagnostics terms
Hootsuite https://www.hootsuite.com/legal/general-data-protection-regulation	Canada	Transmitted from time to time	Name, photos, age, gender, geographic location, opinions, preferences, and phone numbers that are provided or posted by social media users.	To manage social media platforms centrally.	In accordance with the Hootsuite terms
GameSight https://console.gamesight.io/privacy-policy	United States	Transmitted from time to time	Marketing attribution data	To analyze the performance and marketing efforts of the Game.	In accordance with the GameSight privacy policy

Data Destruction

Personal information is retained in accordance with the data retention periods as detailed in section “Data Retention”. With the exception of the personal information set out below, personal information, which has fulfilled the purpose for which it was collected or used, and has reached the period of time during which personal information was to be possessed, will be destroyed in an irreversible way. Personal information stored in electronic files will be deleted safely in an irreversible

way by using technical methods, and printed information will be destroyed by shredding or incinerating such information.

The personal information detailed in section “*Data Retention*” are required to be retained pursuant to the following laws:

Act on the Consumer Protection in Electronic Commerce, Etc.	Article 6 of the Act on the Consumer Protection in Electronic Commerce	<p>In an electronic commerce or a mail-order sale:</p> <ul style="list-style-type: none">• Records regarding labelling and advertising (6 months)• Records regarding execution or withdrawal of a contract (5 years)• Records regarding the payment of a price and the supply of goods and services (5 years)• Records regarding customer services or dispute resolution (3 years)
Protection of Communications Secrets Act	Article 41 of the Decree of the Act, Article 15-2 of the Protection of Communications Secrets Act	<ul style="list-style-type: none">• Log records, IP address (3 months)• The date of telecommunications by users, the time that the telecommunications start and end, the frequency of use (12 months)

You may exercise rights related to the protection of personal information by requesting access to your personal information or the correction, deletion or suspension of processing of your personal information, etc. pursuant to applicable laws such as the Personal Information Protection Act (“**PIPA**”).

You may also exercise these rights through your legal guardian or someone who has been authorized by you to exercise the right. However, in this case, you must submit a power of attorney to us in accordance with the Enforcement Regulations of the PIPA.

You can also withdraw your consent or demand a suspension of the personal information processing at any time.

Additional Use and Provision of Personal Information

In accordance with the PIPA, we may use or provide personal information within the scope of reasonably related to the initial purpose of the collection, in consideration of whether disadvantages have been caused to data subjects and whether necessary measures have been taken to secure such as encryption, etc. We will determine with due care whether to use or provide personal information in consideration of general circumstances including relevant laws and regulations such as the PIPA, purpose of use or provision of personal information, how personal information will be used or provided, items of personal information to be used or provided, matters to which data subjects provided consent or which were notified/disclosed to data subjects, impact on data subjects upon the use or provision, and measures taken to protect subject information. Specific considerations are as follows:

- whether the additional use/provision is related to the initial purpose of the collection;
- whether the additional use/provision is foreseeable in light of the circumstances under which personal information was collected and practices regarding processing;

- whether the additional use/provision unfairly infringe on the interests of the data subject; and
- whether the necessary security measures such as pseudonymization or encryption were taken.

Contact

To protect your personal information and handle complaints relating to your personal information, we have appointed the following department responsible for managing and protecting your personal information.

- Data Protection Department, responsible for the management and safety of your personal information
- Email: privacy@10chambers.com