

## Privacy Policy

### ***L.O.L. Surprise!***

Last Updated: 27 May 2021

We are committed to respecting your privacy and protecting your personal data. This privacy policy ("**Policy**") sets out how we use data relating to you and applies to all use of your personal data by Outright Games Limited with registered office at Unit 54 Merlin House, Meteor Way, Lee-On-The-Solent, Hants, England, PO13 9FU. Our company registration number is 10385931 ("**we**", "**us**" or "**our**").

This Policy sets out the basis on which personal data will be processed by us. This Policy applies to personal data we may collect from you, or that you provide to us, through or in connection with our "L.O.L. Surprise!" game website (the "**Website**"). This Policy also applies for our "L.O.L. Surprise!" game application where we make this Policy available (the "**App**"). Our Website and App are together the "**Services**". Please read the Policy carefully to understand our views and practices regarding your personal data.

We will only collect and process information about you in accordance with this Policy and we will only use information collected about you in accordance with applicable data protection laws including without limitation the Data Protection Act 2018 and the UK GDPR (as defined in the Data Protection Act 2018). Where we decide the purpose or means for the processing of the personal data that you provide when using our Services, we are the "data controller".

You have the right to object to the processing of your personal data, including where your personal data is being processed for direct marketing purposes. Further information on this right, and your other rights, is set out below.

If you have any concerns over privacy, or this Policy, contact us at [privacy@outrightgames.com](mailto:privacy@outrightgames.com).

#### **1. how we collect and use your personal data**

1.1 The table below explains what data we collect, how we use it, and which recipients it might be shared with.

<b>Your data</b>	<b>How we use it</b>	<b>Third Party Recipients</b>
Website support / enquiry information ( <i>information we receive when you get in touch with us for support through the App or by email</i> ): <ul style="list-style-type: none"><li>• Email address; and</li><li>• Other personal data you choose to send to us.</li></ul>	We process this information in accordance with the terms of our contract with you (where we need this information to provide our Services to you such as under our Terms of Use) and in pursuit of our legitimate interests in responding to your enquiry and also in order to improve our Services (such as where you notify us of a problem or a Website issue).	None.
App support / enquiry information ( <i>information we receive when you get in touch with us via our App</i> ):	In line with the legitimate interest we have in promoting our business, we will process your enquiries to provide you with	None.

<ul style="list-style-type: none"> <li>• Contact details (email address); Profile ID or other game related identifier and</li> <li>• Other personal data you may send to us.</li> </ul>	<p>information about the Services we offer.</p> <p>This might include replying to your enquiry. We may also process enquiries to take steps you ask of us with a view to entering into an agreement to provide you with our Services.</p> <p>You are under no obligation to provide us with any details, but if you don't provide all relevant information, we may not be able to help.</p>	
<p>App analytics and usage information <i>(collected automatically after you load the App and agree to the DISCLOSURE AND CONSENT notice within the App):</i></p> <p>After this point, we collect log and analytical information, such as your internet protocol (IP) address, time zone setting and location, operating system and platform and other technology on the devices you use ("<b>App Technical Data</b>")</p>	<p>We process this information to understand how visitors use our App and to compile statistical reports regarding that activity (for example, your IP address is used to approximate the country from which you access our App, and we aggregate this information together so we know that, for example, most of the visitors to our App are in England). In many cases the data would be aggregated and/or anonymised so that it would not identify you.</p> <p>To the extent this data includes your personal data, we rely upon your prior consent before processing it. You can withdraw your consent by notifying us at any time.</p>	<p><u>PlayFab:</u>  <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p> <p><u>Google Analytics:</u>  <a href="https://policies.google.com/privacy?gl=GB&amp;hl=en">https://policies.google.com/privacy?gl=GB&amp;hl=en</a></p> <p><u>AppsFlyer:</u>  <a href="https://www.appsflyer.com/privacy-policy/">https://www.appsflyer.com/privacy-policy/</a></p> <p><u>GameAnalytics:</u>  <a href="https://gameanalytics.com/privacy/">https://gameanalytics.com/privacy/</a></p> <p><u>Firebase:</u>  <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a></p> <p><u>Facebook:</u>  <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a></p> <p><u>IronSource:</u>  <a href="https://www.is.com/privacy-policy/">https://www.is.com/privacy-policy/</a></p>
<p>Website analytics and usage information <i>(collected automatically when you use the Services, or which may be available to us from the Website platforms / stores):</i></p>	<p>We may collect this data so that we can understand usage of our Website, analyse and improve our Website and develop new services or new parts thereof. In some cases it may also help us to identify problems (e.g. bugs or</p>	<p><u>PlayFab:</u>  <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p> <p><u>Google Analytics:</u>  <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a></p>

<ul style="list-style-type: none"> <li>• IP address;</li> <li>• Location (country and city);</li> <li>• Country of install and language;</li> <li>• Unique device ID, hardware manufacturer and model;</li> <li>• Operating system and version;</li> <li>• Relevant Website and version; and</li> <li>• 'Events' related to the Website stream, such as playing, pausing and stopping the Website and choices/selections within the Services, interactions with the Website</li> </ul> <p><b>("Website Technical &amp; Usage Data").</b></p>	<p>problems preventing the Services' progression).</p> <p>In many cases the data would be aggregated and/or anonymised so that it would not identify you.</p> <p>To the extent this data includes your personal data, we rely upon your prior consent before processing it. You can withdraw your consent by notifying us at any time.</p>	<p><a href="https://www.google.com/privacy?hl=en">ogle.com/privacy?hl=en</a></p> <p><u>GameAnalytics:</u> <a href="https://gameanalytics.com/privacy/">https://gameanalytics.com/privacy/</a></p> <p><u>Facebook:</u> <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a></p>
<p>For the purposes of our advertising attribution activities, we may process the following personal data:</p> <ul style="list-style-type: none"> <li>• App Technical Data;</li> <li>• Website Technical &amp; Usage Data, as defined above; and</li> <li>• Information about the details of the advertising campaign and partner which resulted in your engagement with us (e.g. which Facebook ad you clicked through to then install the Website).</li> </ul>	<p>We may process this information so that we can understand which of our partners, and/or our marketing campaigns or adverts, directed you to us, such as to use our App.</p> <p>Attribution information enables us to promote the success of our company by better understanding the comparative successes of our marketing and our partners' efforts, so that we can be more efficient with our marketing and our arrangements with partners.</p> <p>We process this information on the basis of our legitimate interests, being our interests to promote the success of our company.</p>	<p><u>Facebook:</u> <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a></p> <p><u>IronSource:</u> <a href="https://www.ironsource.com/privacy-policy/">https://www.ironsource.com/privacy-policy/</a></p>
<p>In connection with your use of our App, we may process the following of your personal data in order to serve and customise advertising to you</p>	<p>We may process your personal data in connection with our use of the services of third party advertising vendors (such as Facebook's services), so that we can advertise our products and services to App users on third</p>	<p><u>PlayFab:</u> <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p> <p><u>Google Analytics:</u> <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a></p>

<p>on third party advertising platforms:</p> <ul style="list-style-type: none"> <li>• App Technical Data (as defined above, such as your IP address and technical analytics about your visit to our App);</li> <li>• Where supplied, we may collect your Facebook account name, Facebook friends and device ID.</li> </ul>	<p>party services (such as Facebook platforms).</p> <p>The data processing allows us to identify which App users are on the third party platform relevant for advertising, and to better understand which of our adverts, products and services may be of most interest.</p> <p>To the extent this data includes your personal data, we rely upon your prior consent before processing it. You can withdraw your consent by notifying us at any time.</p>	<p><a href="https://policies.google.com/privacy?gl=GB&amp;hl=en">ogle.com/privacy?gl=GB&amp;hl=en</a></p> <p><u>AppsFlyer:</u> <a href="https://www.appsflyer.com/privacy-policy/">https://www.appsflyer.com/privacy-policy/</a></p> <p><u>GameAnalytics:</u> <a href="https://gameanalytics.com/privacy/">https://gameanalytics.com/privacy/</a></p> <p><u>Firebase:</u> <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a></p> <p><u>Facebook:</u> <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a></p> <p><u>IronSource:</u> <a href="https://www.is.com/privacy-policy/">https://www.is.com/privacy-policy/</a></p>
<p>In connection with your streaming of our Services, we may process the following of your personal data in order to serve and customise advertising to you on third party advertising platforms:</p> <p>Website Technical &amp; Usage Data</p>	<p>We may process your personal data in connection with our use of the services of third party advertising vendors (such as Facebook's services), so that we can advertise our products and services to App users on third party services (such as Facebook platforms).</p> <p>The data processing allows us to identify which App users are on the third party platform relevant for advertising, and to better understand which of our adverts, products and services may be of most interest.</p> <p>To the extent this data includes your personal data, we rely upon your prior consent before processing it. You can withdraw your consent by notifying us at any time.</p>	<p><u>PlayFab:</u> <a href="https://privacy.microsoft.com/en-us/privacystatement">https://privacy.microsoft.com/en-us/privacystatement</a></p> <p><u>Google Analytics:</u> <a href="https://policies.google.com/privacy?gl=GB&amp;hl=en">https://policies.google.com/privacy?gl=GB&amp;hl=en</a></p> <p><u>AppsFlyer:</u> <a href="https://www.appsflyer.com/privacy-policy/">https://www.appsflyer.com/privacy-policy/</a></p> <p><u>GameAnalytics:</u> <a href="https://gameanalytics.com/privacy/">https://gameanalytics.com/privacy/</a></p> <p><u>Firebase:</u> <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a></p> <p><u>Facebook:</u> <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a></p> <p><u>IronSource:</u> <a href="https://www.is.com/privacy-policy/">https://www.is.com/privacy-policy/</a></p>

<p>Newsletters, updates and marketing messages <i>(information provided by you when signing up to newsletter or marketing emails via our website</i> (<a href="https://lolsurprisemoviemaker.com/">https://lolsurprisemoviemaker.com/</a>) linked to the App, if you choose to sign-up):</p> <p>Email address.</p>	<p><u>Consent-based mailing lists</u></p> <p>We may process your data to make suggestions and recommendations to you and other users of the App about: (i) news and updates relating to the App, us, our partners, products, services and content; (ii) content, goods and services that may interest you; and (iii) other promotional activity and events we think may be of interest.</p> <p><u>'Soft opt-in' mailing lists</u></p> <p>In some instances (such as with some of our existing customers) the law may permit us to process your personal information in order to send information to you by marketing messages that we think is of interest for you on the basis of our legitimate interests, being our legitimate business interests in marketing our activities and promoting the success of our business and the App, content, products and services. We may process your information for this purpose.</p> <p>If the information is not of interest for you, you can opt-out at any time by emailing us.</p>	<p>None.</p>
<p>Device-level consents and push notifications.</p>	<p>Most smartphone and tablet devices compatible with the App provide in-device privacy control mechanisms such as that the device may require your prior consent (to your device provider) in order for the App to access certain device data and to provide you with certain Website functionality.</p> <p>You can control your device-level consents by selecting your preferred option in the 'pop-up' option your device presents to you at the relevant time. Also, you may be able to edit your preferences</p>	<p>None.</p>

	<p>later in the 'settings' options available from your device provider.</p> <p>Your editable consent preferences may include, for example, whether you would like the App to send you 'push notifications' on your device or not.</p>	
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## 2. Your Rights In Relation To Your Personal Data

2.1 You have certain rights over the way we process personal data relating to you. We aim to comply without undue delay, and within one month at the latest, in response to any requests submitted by you to us:

- for a copy of personal data we are processing about you and/or to have inaccuracies corrected;
- to restrict, stop processing, or to delete your personal data;
- for a machine-readable copy of your personal data, which you can use with another service provider. Where it is technically feasible, you can ask us to send this information directly to another provider if you prefer; and
- to make a complaint to a data protection regulator. You may contact them at: <https://ico.org.uk/concerns/>.

2.2 To make a request in relation to any of the aforementioned rights, please send your request to [privacy@outrightgames.com](mailto:privacy@outrightgames.com) .

2.3 You may request deletion of your personal data by sending an e-mail to [privacy@outrightgames.com](mailto:privacy@outrightgames.com) . Please note that some information may remain in our private records after deletion. We may use any aggregated data derived from or incorporating your personal data but not in any manner that would identify you personally.

2.4 For data processing activities for which we rely upon your consent, you can withdraw your consent at any time by using the tools provided (if applicable, such as through your device settings) or otherwise by contacting us at [privacy@outrightgames.com](mailto:privacy@outrightgames.com) .

## 3. DISCLOSURE OF YOUR Personal DATA

3.1 We will share your personal data with third parties only in the ways that are described in this Policy.

3.2 Group, suppliers, subcontractors, service providers. We keep your personal data confidential, but may disclose it to any member of our corporate group, our personnel, suppliers or subcontractors insofar as it is reasonably necessary for the purposes set out in this Policy.

3.3 Government authorities. In addition, we may disclose your personal data 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 to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention).

- 3.4 Potential acquirers or investors. If we are involved in a merger, acquisition, or sale of all or a portion of our business or assets, the personal data we hold may be included as part of that sale, in which case you will be notified via email, your account and/or a prominent notice on the Website/App of any changes in ownership or use of your personal data, as well as any choices you may have.
- 3.5 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 us, our personnel or customers, or others.
- 3.6 Stores. We may also disclose your personal data, to the extent necessary, to application stores or platforms (such as the Apple App Store and Google Play Store) if that is required, for example, for fulfilment of an order you make (e.g. if needed to fulfil an App/Website order) or in order to investigate or prevent fraud.
- 3.7 We only permit our suppliers and subcontractors to process your personal data for specified purposes and in accordance with our instructions. All our third-party service providers are required to take appropriate security measures to protect your personal data.

#### **4. Data Retention**

- 4.1 We will only hold data about you for as long as necessary, bearing in mind the purpose for which that data was collected, or as otherwise described in this Policy.
- 4.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### **5. Security**

- 5.1 We will take commercially reasonable, appropriate technical and organisational measures to ensure a level of security appropriate to the risk that could be encountered via the use of our Services taking into account the likelihood and severity those risks might pose to the rights and freedoms of our Service visitors and customers.
- 5.2 In particular, we will take precautions to protect against the accidental or unlawful destruction, loss or alteration, and unauthorised disclosure of or access to the personal data transmitted, stored or otherwise processed by us.

#### **6. International Data Transfers**

- 6.1 Where necessary, there are agreements in place to ensure that personal data is processed using appropriate safeguards that meet the requirements of data protection laws. Such appropriate safeguards may include standard data protection clauses adopted by a national data protection regulator and/or those approved by the European Commission, such as the European Commission's standard contractual clauses, or other appropriate measures.

6.2 If you would like to find out more about these safeguards or if you have any other queries or comments in relation to this Policy, please let us know by emailing us at [privacy@outrightgames.com](mailto:privacy@outrightgames.com) .

## **7. CHILDREN**

7.1 We have designed the Services for the enjoyment of children of all ages. Therefore we are aware that we must be extra cautious when processing personal data. Due to the nature of our Services, we do collect and use data relating to children in order to provide our Services and let them engage with the App. We fully appreciate that children need particular protection when their personal data is collected and processed because they may be less aware of the risks involved. As such we only use their personal data for the limited purposes set out in this Privacy Policy.

7.2 If a parent or guardian becomes aware that their child has provided us with information without their knowledge or approval, they should contact us at [privacy@outrightgames.com](mailto:privacy@outrightgames.com) . We will seek to delete such information from our files within a reasonable time.

## **8. General**

8.1 If you follow a link from the Services to any third party websites, you should be aware that those websites may have their own privacy policies. We do not accept any responsibility or liability for those websites. Please check the policies of any third party websites before submitting any personal data to those websites.

8.2 We may make changes to this Policy in the 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 by email.

8.3 All questions, comments or enquiries should be directed to us. We will try to respond to you within 48 hours or otherwise within a reasonable time.

## **CONTACT US**

E-mail: [privacy@outrightgames.com](mailto:privacy@outrightgames.com)