

## PRIVACY POLICY

We give you the power to share information with us as part of our mission to deliver fun to millions of people around the world. This Privacy Policy applies to all GoodGamesSoft LLC, products and services that do not have a separate privacy policy or that link to this policy, which we call the GoodGamesSoft LLC products, apps and games (the "**Products**"). This policy describes what information we collect when you use the Products or Site and how it is used and shared.

We offer the following games (the "**Products**"):

- **Goodville**

**IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, DO NOT DOWNLOAD OR USE OUR PRODUCTS OR INTERACT WITH OUR SITE.**

### Data processing information in short:

*Personal data collected is owned by GoodGamesSoft LLC (Registered address: 220002, Republic of Belarus, Minsk, Storozhhevskaya Str. 8-504), which is responsible for your information under this Privacy Policy (the "Data Controller")*

Our main data processing purposes:

- To assess your current mental state
- To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy / Notifying you about updates

*Your data subject rights:* to obtain information about your stored personal data, the right to correct and transmit your data and, if necessary, to object to (when data is processed based on our legitimate interest or your consent), restrict the processing of, or deleting of, your personal data. You also have a right to submit a claim at the State Data Protection Inspectorate at [ada@ada.lt](mailto:ada@ada.lt)

For more data processing purposes and other specific information about your personal data processing please refer to a Full version of this Privacy policy below.

### Full version of the Privacy policy

## 1. APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy applies to your personal information when you:

- use our Site and/or Products, including when you sign up for an account, create or share, and message or communicate with others, play the game with your friends and other people, connect with Facebook or Google Play Gamecenter;
- contact us via e-mail/phone/etc.;

- provide us with your personal information in any other way (e.g. through customer support inquiries, feedback sharing, etc.).

## 2. INFORMATION WE COLLECT ABOUT YOU

We collect several types of information from and about users of our Site and Products, which can be grouped together as follow:

- **Identity Data** includes Facebook name, Facebook avatar URI, IDFA, GAID, Facebook App Scoped User ID, Android device ID (Secure.ANDROID\_ID), iOS device ID (UIDevice identifierForVendor).
- **Contact Data** includes email address.
- **Technical Data** includes internet protocol (IP) address, device info such as mobile device model, operating system, platform, browser type and version and other device settings;
- **Health Data** includes the results of your SWM,Luscher tests and questionnaire surveys.

If you want to renew your profile used for behavioral advertising services, you can reset by yourself your Mobile Advertising ID (GAID or IDFA) by following the processes described below:

- **IOS:** go to "Settings" then "Privacy", then "Advertising" and then "Reset Advertising ID" (see demo on provider's website [Apple Support](#)).
- **Android :** go to "Settings" then "Google" then in "Ads" then "Reset Advertising ID" (see demo on provider's website [Google Support](#)).

**Be aware.** Free media content is financed by advertising release. By resetting your Mobile Advertising ID, you will still receive advertising on your mobile phone, but this will not be "behavioral advertising" anymore and may not correspond to your interests.

We also may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### Third-Party Widgets

Our Products contain widgets and social media features, such as Facebook, Instagram. You are the only person who decides if you would like to press this button and share your personal data. These widgets and features collect your IP address, the information about the page you are visiting during your use of the Products, and may set a cookie to enable the feature to function properly. Your interactions with these features are governed by the relevant privacy policy:

**Facebook:** <https://www.facebook.com/policy>

**Instagram:** <https://help.instagram.com/519522125107875>

### 3. HOW WE USE INFORMATION COLLECTED ABOUT YOU

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract (for example, Terms of Use) we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we receive your explicit consent to process the relevant personal data. You have the right to withdraw consent to marketing at any time by contacting us at [info@goodville.me](mailto:info@goodville.me)
- Where we need to comply with a legal or regulatory obligation.

We have set out below a description of all the data processing purposes and which of the legal bases we rely on. We have also identified what our legitimate interests are where appropriate.

**1. To assess your current mental state** – Health data collected via SWM and Luscher tests – the legal basis is your explicit consent. Our Game is based on the 2 psychological tests: 1) Special Working Memory (SWM) test – a test which assesses your attention, speed of your reaction and your memory capabilities, which indicate your current mental state by numeric value of the reaction speed and number of errors made; and 2) Luscher test – a test which indicates your mental state by evaluating your preferred colors from the given sequence and then the most unpleasant color from the remaining; and questionnaire surveys. Your choices and the set as a whole are indicating your current psychological state and, thus, **is considered as a health data in terms of the GDPR**. This data is encrypted once created and is stored for 1 year after the last use of the last game session.

**2. To manage our relationship with you which will include: Notifying you about changes to our terms or privacy policy / Notifying you about updates** - Identity / Contact /Profile – Legal basis is performance of a contract with you / Necessary to comply with a legal obligation / Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

**3. To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)** - Identity / Contact / Technical – Legal basis is a necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise).

**4. To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you** - Identity / Profile /Technical – Legal basis is your explicit cookie consent / Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

**5. To use data analytics to improve our website, products/services, marketing, customer relationships and experiences** - Technical – Legal basis is your explicit cookie consent / Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

### 4. DISCLOSURE OF YOUR INFORMATION

We collect information globally and store that information within the EU. We use encryption and other strong security measures to protect data. We also sign EU Standard Model Clauses with our affiliated company TotalGames *Registered address: 220002, Republic of Belarus, Minsk, Storozhevskaya Str. 8, office 504-4* to ensure the surety and integrity of the data.

We may share your information with certain third parties selected by us to help support our operations.

These include, for example, hosting provider Hosterby located in Belarus; AWS, IT developers from TotalGames LLC located in Belarus; and the following service providers that help us to analyze web traffic, send emails, and track customer support requests:

**Adjust:** [Privacy Policy](#)

**Facebook Analytics:** [Privacy Policy](#)

**Facebook Ads:** [Privacy Policy](#)

Android SDK (Google Play Game Services API, Google Fit API)

iOS SDK

We may also disclose your personal information when we believe we have your consent to do so, such as when you contact us for customer support and provide us with any information.

We may also disclose your personal information when we have a good faith belief (i) we are required to do so by law, or in response to a subpoena, court order, or other legal mechanism, or (ii) it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations.

We may share your personal information with our corporate affiliates to be used in a manner consistent with this Privacy Policy, and if we or our assets gets acquired or transferred in part or whole to another organization, your information and any other information we have collected may be among the items transferred.

Finally, where permissible according to applicable law, we may use certain limited personal information about you, such as your email address, to hash it and to share it with social network websites (such as Facebook, Google+, Twitter, LinkedIn) to generate leads, drive traffic to our Site or otherwise promote our Products. These processing activities are based on our legitimate interest in undertaking marketing activities to offer you products that may be interested to you.

The social network website with which we may share your personal data are not controlled or supervised by us. Therefore, any questions regarding how your social network website service provider processes your personal data should be directed to such provider.

Please note that you may, at any time, ask us to cease processing your personal information for direct marketing purposes by sending an e-mail to [info@goodville.me](mailto:info@goodville.me)

## 5. COOKIES

Cookies are small text files sent by website to your computer or mobile device that enable services and website features to function properly. Cookies make it easier for you to use our Site during future visits. They also allow us to monitor traffic and to personalize the content of our Site for you. Session-based cookies only last while your browser is open, and are automatically deleted when you close the browser. Persistent cookies last until you or your browser deletes them or until they expire. For more information go to our [Cookie Policy](#).

## 6. SECURITY

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Site or Products, you are responsible for keeping this password confidential. We urge you to be careful about giving out information on the Site or Products.

## 7. CHILDREN

Our Site and Products are not directed to individuals under 16. We do not knowingly collect personal information from children under 16. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

## 8. YOUR DATA SUBJECT RIGHTS

**To object to processing:** You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities)

**To be informed:** You have the right to be provided with clear, transparent, and easily understandable information about how we use your Personal Data and your rights

**Right of access:** You have the right to obtain access to your Personal Data (if we are processing it), and certain other information about or privacy practices with respect to your Personal Data

**To rectification:** You are entitled to have your information corrected if it is inaccurate or incomplete

**To erasure ("to be forgotten"):** You have the right to request the deletion or removal of your personal information/Personal Data where there's no compelling reason for us to keep using it. We will delete backup copies of that Personal data from our archives as soon as is practically possible, to the extent allowed by our other data retention obligations (e.g., to protect other data stored in the same backup archives, or meet other regulatory or legal requirements). As soon as those obligations have been fulfilled, we will permanently delete those archives as quickly as possible

**To restrict processing:** You have rights to "block" or suppress further use of your personal information/Personal Data that we process. When processing is restricted, we can still store your personal information/Personal Data, but may not use it further

**To data portability:** You have rights to obtain and reuse your personal information/Personal Data for your own purposes across different services

**To lodge a complaint:** You have the right to lodge a complaint about the way we handle or process your personal information/Personal Data with your national data protection regulator. However, we hope you will contact us first, so we will try to address your complaint directly

**To withdraw consent:** If you have given your consent to anything we do with your personal information/Personal Data, you have the right to withdraw your consent at any time. This includes your right to withdraw consent to us using your personal information/Personal Data for marketing purposes

To exercise any of your rights specified above, please, contact us at [info@goodville.me](mailto:info@goodville.me) providing specific and detailed information regarding exercising of the relevant right

### Data Retention

We only retain your personal information/personal Data for as long as is necessary for us to use your information as described above or to comply with our legal obligations and legitimate interests. Please be advised that this means that we may retain some of your personal information/personal Data after you cease to use our Site and Products. For instance, we may retain your data as necessary to meet our legal obligations, such as for tax and accounting purposes.

When determining the relevant period in which we retain or establish/revise periods for retaining personal information/Personal Data, we will take the following factors into account:

- our contractual obligations and rights in relation to the information involved
- legal obligation(s) under applicable law to retain data for a certain period of time or with respect to pending or anticipated legal actions
- our legitimate interest where we weigh your interest in controlling your Personal Data and against our lawful purpose in processing your Personal Data

- statutes of limitations under applicable law(s)
- if you have made a request to have your information deleted

Otherwise, pursuant to GDPR, we will securely erase your personal information/personal Data once there is no lawful basis or legal obligation to store or process it.

## **9. CONTACT US**

We may provide additional information about our privacy practices at other points, for example, when we ask you to provide personal information in connection with a particular Product, and where this will help us provide more relevant and timely information.

We reserve the right to make changes to our practices and this Privacy Policy at any time. If we change the way we handle your personal information, we will update this Privacy Policy and notify you as appropriate.

If you have any requests concerning your personal information or any queries with regard to this Privacy Policy please feel free to contact us at [info@goodville.me](mailto:info@goodville.me).

For the implementation of your data subject rights and other privacy related questions, please contact our EU representative: Vladislav Smirnov, [info@goodville.me](mailto:info@goodville.me).