

KUATO STUDIOS PRIVACY POLICY

Kuato Games (UK) Limited respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or use all software applications created by Kuato Games (UK) Limited (the “Applications” or “Apps”) and tell you about your privacy rights and how the law protects you. Kuato Games (UK) Limited is a data controller and is responsible for your personal data in this context (collectively referred to as “we”, “us” or “our” in this privacy policy). If you are located in the United States, this Privacy Policy also describes how we may collect and use personal information of children under the age of 13, as governed by the Children’s Online Privacy Protection Act.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Full name of legal entity: Kuato Games (UK) Limited
Name or title of data privacy manager: Amy Walkers
Email address: privacy@kuatostudios.com
Postal address: 203 Metropolitan Wharf, 70 Wapping Wall, London, E1W 3SS

Personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of data as follows:

User Provided Information

Website. When you register with us or visit us through our website we generally collect and use anonymized data using standard website tools. However, we also collect and use your personal data in the form of IP addresses as well as email addresses and other contact information that you choose to provide us and that may be used for marketing purposes or to respond to your inquiries.

Applications. Our Applications collect technical data needed for their operation and to meet regulatory and security requirements and we may use Firebase and AppsFlyer analytics SDKs for that purpose.

Marketing. We may use the information you provided us to contact you from time to time to provide you with important information, required notices, and marketing promotions such as our newsletter (where you have opted-in to receive it from us).

Automatically Collected Information

Our website may collect certain information automatically, including, but not limited to, the type of browser you use, the IP address of your machine, your operating system, and information about the way you use our website. We do not collect data through non-essential cookies on our website

Does the Application collect precise real time location information of the device?

As described above, the Application does not collect precise information about the location of your mobile device.

Do third parties see and/or have access to information obtained by the Application?

Only aggregated, anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose User Provided and Automatically Collected Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement; and
- if Kuato Games (UK) Limited is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Website of any change in ownership or uses of this information, as well as any choices you may have regarding this information.

Specifically, within the Application, we may share information described above with Firebase and Appsflyer. Please contact us at privacy@kuatostudios.com or otherwise contact our data privacy manager as described above for more information about these partners, including our relationship with them and their own privacy practices.

In the limited circumstances that we do collect personal information, we require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

How we use your personal data

We will use your personal data for sales and marketing purposes where this is for our legitimate interests or you have subscribed to receive these communications. You can opt out at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it and as described in this policy, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at privacy@kuatostudios.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may share your personal data in the following situations:

With our service providers: We may share your personal data with our service providers to monitor and analyse the use of the Application, to help support and maintain the Application, to contact you, to advertise on third party websites to you after you visited our website or for payment processing.

For business transfers: We may share or transfer your personal data in connection with, or during negotiations of, any merger, sale of company assets, a business, financing, or acquisition of all or a portion of our business to another company.

With affiliates: We may share your personal data with our affiliates for legitimate business purposes or legal purposes.

With business partners: We may share your personal data with our business partners to offer you certain products, services or promotions within the scope of legitimate interests or as subscribed by you.

With third-parties: We may share your personal data with our professional advisors, consultants, third-parties in the course of managing disputes, our auditors or other third-parties as part of managing our business.

International transfers

Whenever we transfer your personal data out of the UK/EEA, we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards have been implemented.

Where we use certain service providers, we may use specific contracts approved by the European Commission or other appropriate supervisory authority which give personal data the same protection it has in Europe. For further details, see

European Commission: Model contracts for the transfer of personal data to third countries.

What are my UK / EEA legal rights?

Users who reside in the UK or in the EEA have certain rights relating to the personal information we hold in accordance with and subject to the General Data Protection Regulation (GDPR) and other UK and European data privacy laws to: (i) check whether we hold personal information about you and to access such data (in accordance with our policy); (ii) request the correction of personal information about you that is inaccurate; (iii) have a copy of the personal information we hold about you provided to you or another controller where technically feasible; (iv) request the erasure of your personal information; (v) object to the processing of your personal data; and (vi) request the restriction of processing concerning you. These rights are subject to qualifications and exemptions under applicable data privacy laws and the GDPR itself. To exercise your rights, please send your request to privacy@kuatostudios.com and write "EU Privacy Rights" as the subject. You may be asked to verify your identity.

Information is only collected by the Application when you log in online and use the Application. You can stop all collection of information by the Application easily by not using the service. You can also request to opt-out via email, at privacy@kuatostudios.com

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

What are my California legal rights?

California law permits our users who are California residents to request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year. To make such a request, please write to us at privacy@kuatostudios.com.

If you are a California resident, California law provides you with the following rights with respect to your personal information:

- The right to know what personal information we have collected, used, disclosed and sold about you. To submit a request to know, you may email us at privacy@kuatostudios.com. You also may designate an authorized agent to make a request for access on your behalf.
- The right to request that we delete any personal information we have collected about you. To submit a request for deletion, you may email us at privacy@kuatostudios.com. You also may designate an authorized agent to make a request for deletion on your behalf.

When you exercise these rights and submit a request to us, we will verify your identity by asking you for your email address, telephone number, and/or information about your account with Kuato. We also may use a third party verification provider to verify your identity. Kuato will endeavor to honor client's requests unless such a request conflicts with certain lawful exemptions under the California Consumer Privacy Act of 2018. Please note that Kuato is only required to honor such requests twice in a 12-month period.

Your exercise of these rights will have no adverse effect on the price and quality of our goods or services. For the 12-month period prior to the date of this Privacy Policy, the Kuato has not sold any personal information about its clients; nor does it have any plans to do so in the future.

Data Retention Policy, Managing Your Information

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.

We will retain User Provided data for as long as you use the Application in accordance with our data retention policy and as long as reasonably necessary for the purposes for which it is collected. We will retain Automatically Collected information for up to one year and thereafter may store it in aggregate. If you'd like us to delete User Provided Data that you have provided via the Application, please contact us at privacy@kuatostudios and we will respond in a reasonable time. Please note that some or all of the User Provided Data may be required in order for the Application to function properly.

Children and Privacy Rights

Where applicable, we comply with the requirements of the US Children's Online Privacy Protection Act ("COPPA") and other laws governing use of the personal information of children.

Our website itself is not directed to children, and we do not knowingly collect personal information from children through our website.

We do not use the Application to collect personal information or market to children under the age of 13 (or such higher age for children to consent to processing their data, as applicable by law) unless we first obtain verifiable parental consent from a child's parent or guardian as required by COPPA or other applicable law. If a parent or guardian becomes aware that a child has provided us with information without their consent, he or she should contact us at privacy@kuatostudios.com. We will delete such information from our files promptly.

If you are a parent or guardian of a child under 13, you have the right to review or have deleted and refuse to permit its further collection or use by contacting us at privacy@kuatostudios.com.

Security

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches and you should take customary precautions to guard against "malware" (viruses, Trojan horses, bots, etc.), for example by installing and updating suitable anti-virus software.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Changes

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here <http://kuatostudios.com/privacy/>. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes. You can check the history of this policy by <http://www.kuatostudios.com/privacy/>.

Your Consent

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing" means using cookies on a computer / handheld device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United Kingdom. If you reside outside the United Kingdom your information will be transferred, processed and stored there under United Kingdom privacy standards.

Contact us

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at privacy@kuatostudios.com

[Effective date: May 31, 2020](#)