

## **PRIVACY & COOKIES POLICY „PIRATES OF THE ARRLAND”**

*This Privacy Policy sets out the rules for the processing of Users' personal data in relation to activities performed on the Website, in accordance with the provisions of the Terms & Conditions. This Privacy Policy is an attachment to the Terms and Conditions available on the Website: [www.arreland.com](http://www.arreland.com)*

*All terms included in this Privacy Policy should be interpreted in accordance with the provisions of the Terms and Conditions, unless their different meaning has been clearly indicated in this document.*

**Your personal data is processed as follows:**

### **I. GENERAL INFORMATION**

Personal data is processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC ( general regulation on data protection - hereinafter "GDPR"), the Act on the Protection of Personal Data of May 10, 2018 (Journal of Laws of 2018, item 1000) and the Act on the provision of electronic services of July 18, 2002 (Journal of Laws of 2020, item 344, as amended).

**The Personal Data Administrator is:**

**ANFATA GAMES sp. z o. o.**, with its registered office at Mieczysława Karłowicza Street 13/5, 40-145 Katowice, Poland. All representations shall be directed to this entity only (hereinafter referred to as the "Administrator" or "Service Provider"). Contact with the Service Provider is available at e-mail: [contact@arreland.com](mailto:contact@arreland.com).

### **II. WHAT ARE THE PURPOSES OF PERSONAL DATA PROCESSING AND WHAT IS THE LEGAL BASIS FOR PROCESSING?**

Personal data is processed for the purposes of:

1. receiving the newsletter (legal basis: Article 6(1)(a) of the GDPR),
2. performance of the Agreement or taking action at the request of the data subject prior to the conclusion of the Agreement (Article 6(1)(b) of the GDPR),
3. handling claims and complaints (Article 6(1)(b) of the GDPR),
4. conclusion and performance of the Agreement, including the performance of individual services (Article 6(1)(b) of the GDPR),
5. sending system messages or notifications to the User (Article 6(1)(f) of the GDPR),
6. developing statistics related to the User's activity on the Website (Article 6(1)(f) of the GDPR),
7. answering questions (Article 6(1)(f) of the GDPR),
8. storing documentation or archiving it for the purposes of examining, processing or settling claims (Article 6(1)(f) of the GDPR),
9. marketing, including monitoring and matching content to Users' interests, monitoring Users' activity, which includes searching for keywords, information on the Portal, as well as managing Users' activity on the Portal - to make it possible, we perform profiling, which, however does not affect the Users' rights or freedoms or otherwise affects the User (legitimate interest of the Service Provider, clearly defined in the provisions of the General Data Protection Regulation (recital 47 of the GDPR).

### **III. HOW DO WE OBTAIN PERSONAL DATA?**

1. We collect personal data directly from Users.
2. We may collect personal data indirectly only during Registration - if the Portal User sends an invitation to a third party. In this case, the User provides the e-mail address of the person to whom the invitation is then sent. This person should confirm their willingness to register and complete their personal data.

### **IV. WHAT DATA DO WE PROCESS AND FOR HOW LONG?**

If:

1. you are browsing the Website: IP address (for static purposes), cookies. We store data until cookies expire.
2. you contact us using the contact form: the data and IP address provided by you. We retain data for 36 months or longer if necessary to assert, process or defend against legal claims.

3. you file a claim or submit a complaint: data contained in the document. We store the data for the period required by law for the purpose of investigating, processing or defending against legal claims. The complaint is considered within 30 days.
4. you order Paid Services: data necessary to provide the Service. If it is access to content, we do not process more data than related to the payment process. The payment service is provided by the payment operator. Card data is not processed by the Service Provider. In the case of stationary training services or other services provided outside the Website, we process the data necessary to use the Service. The data is processed for the duration of the Service, and after this period for the time necessary to investigate, process or defend against legal claims - including accounting, legal and IT services.
5. you receive a newsletter: e-mail address. You can withdraw your consent and unsubscribe from the newsletter by clicking the unsubscribe option directly in each email sent. If you unsubscribe, we will only process information about when you subscribed to the newsletter and when you unsubscribed from it (in both cases your IP address will be saved). NOTE: The Newsletter is not a message system sent by the Service Provider informing about alerts or other important notifications related to the User's Service or other Services.
6. you receive system messages or notifications: username, email address. No notifications and/or system messages will be sent in the event of Account deletion. However, the data will be processed for archiving purposes for a period of up to 36 months or longer (if it is necessary for the purpose of investigating, processing or defending against legal claims).
7. we keep records or archive for the purposes of investigating, processing or settling claims: data necessary for a given process. Deletion occurs after the process is complete.
8. you use the Portal: your activity on the Portal - information resulting from monitoring activity on the Portal aimed at profiling data, including: Information in HTTP headers, which contain information about the browser or application used; Information on standard/optional events, e.g. "page view" or "application installation", further object properties and buttons pressed by visitors to the Portal; Online identifiers, including IP addresses and, if provided, identifiers associated with Facebook or device identifiers (e.g. advertising identifiers in mobile operating systems) and information on opting out / organizing advertising monitoring - are stored until the User's account is deleted.

If we write that we store data for the period required by law for the purposes of research, processing or defense against legal claims, we mean the period indicated by law as the required period.

## **V. WHAT NOTIFICATIONS AND SYSTEM MESSAGES DO WE SEND?**

The website can send notifications (so-called web push notifications) if you agree to it from the browser level. In this case, you will receive notifications visible from your device.

The website may send notifications visible after logging in. The user can set the frequency of sending information. Messages can be sent once a day, once a week, or they can be turned off. By default, the sending of notifications is disabled and the user is asked to select the frequency settings.

The Service Provider may send system messages to the User's e-mail address. These messages are sent as needed and relate to messages related to the Service.

## **VI. WHO DO WE SHARE PERSONAL DATA WITH?**

The recipients of the data may only be authorized employees of the Service Provider or co-workers providing services related to customer service or IT support or accounting or legal services, as well as advertising partners.

## **VII. OUR RIGHTS RELATED TO THE PROTECTION OF PERSONAL DATA**

Each data subject has the right to access, rectify, update, transfer, delete or limit processing, the right to raise objections, the right to withdraw consent at any time (withdrawal of consent does not affect the lawfulness of the processing was made on the basis of consent before its withdrawal), the right to lodge a complaint with the supervisory body, i.e. the President of the Office for Personal Data Protection. In order to exercise your rights, please send a relevant request by e-mail to: [contact@arland.com](mailto:contact@arland.com). We will consider your application immediately, but not later than within 1 month of receiving the request from the User. However, if the execution of the request within the indicated period is not possible, e.g. due to the complicated nature of the request or the number of requests, we reserve the right to extend the deadline for considering the request, but not longer than 2 months. We will inform you by e-mail about the possible need to extend the deadline for processing your inquiry.

## **VIII. COOKIES**

Cookies are sent to web browsers, then saved in the device's memory and read by the server each time you connect to the website. Cookie files do not contain any information enabling third parties to learn your personal data or contact you, e.g. by email or telephone. We also point out that saving cookies does not allow us or unauthorized persons to access your private device.

What types of cookies do we process?

#### **1. Technical cookies**

They enable the correct use of the message transmission and remember your settings after selecting this option on the website and/or allow us to create simple statistics on the use of the website. When collecting information about errors, we use cookies responsible for the login session and the selected language, including e-mail address and username.

#### **2. Google Analytics**

Google Analytics is analytical tool provided by Google that helps website and application owners understand how users use them. The tool may use a set of cookies to collect information and generate reports with website usage statistics. The collected data does not identify individual users. The main type of cookie used by Google Analytics is "\_ga".

In addition to reporting website usage statistics, the data collected by Google Analytics can also help, with some of the cookies described above, to display more relevant advertisements across Google services (e.g. Google Search) and across the web.

[Learn more about Google Analytics cookies and privacy.](#)

#### **How can I disable cookies?**

You decide about the processing of cookies using your browser settings. If you do not want cookies to be processed, you can disable them (select the appropriate privacy options in your browser). You can delete cookies from your browser at any time.

Disabling cookies in your web browser may affect the way the content of the Website is displayed.

#### **IX. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA**

Personal data may be transferred to third countries and international organizations when entities established in these countries have implemented appropriate safeguards for the personal data being processed. If personal data is transferred outside the EEA, the Service Provider uses Standard Contractual Clauses as safeguards for countries where the European Commission has not found an adequate level of data protection.

The transferred data include, in particular: e-mail address, IP address, date and time of each contact related to each opening and clicking on the newsletter email campaign.

#### **X. HOW CAN YOU CONTACT US?**

All inquiries regarding the method of data processing should be directed to the following e-mail address: [contact@arriand.com](mailto:contact@arriand.com).