

# PRIVACY POLICY OF DUARD Ltd.

Last updated 06.11.2015

DUARD Ltd., including its affiliates (“DUARD”) collects, stores, and uses your personal information as a data controller in connection with DUARD’s products, services and websites (together “Services”) according to this privacy policy (“Privacy Policy”).

For questions and information about Privacy Policy, please contact us at [info@duard.eu](mailto:info@duard.eu) or alternatively at the management address of the company - 25 “Nikola Vaptzarov” boul., fl. 1, ap. 1, Sofia, Republic of Bulgaria.

**All DUARD Services are governed by this Privacy Policy and by using or accessing a Service You give consent to the processing, use and disclosure of your data. Please do not install or use the Services if you do not agree to this Privacy Policy.**

DUARD reserves the right to modify this Privacy Policy. Your continued use of Services will signify your acceptance of the changes to this Privacy Policy.

## 1. Your data

Likely situations when you make personal data available to DUARD includes, but are not limited to:

- (i) registration for Services, contests and special events;
  - (ii) accessing Services using a third party ID, such as social networking sites or gaming services;
  - (iii) subscribing to newsletters;
  - (iv) purchasing a product or services through DUARD’s online stores;
  - (v) using “tell a friend,” "email this page," or other similar features;
  - (vi) requesting technical support;
- and
- (vii) otherwise through use of DUARD Services where personal data is required for use and/or participation.

DUARD may supplement your data with data received from third parties in connection with demographic, advertisement, market and other analytics surveys or services.

## 2. Ad Serving Technology

DUARD does not use ad serving technology, but this does not limit the company to commence doing so. In this case, the following below will apply:

DUARD reserves the right to use and disclose the collected non-personal data for purposes of advertisement by DUARD or DUARD’s partners and contractors.

DUARD may employ third party ad serving technologies that use certain methods to collect information as a result of ad serving through Services.

DUARD or third parties operating the ad serving technology may use demographic and location information as well as information logged from your hardware or device to ensure that appropriate advertising is presented within the Service. DUARD or third parties may collect and use data for this purpose including, but not limited to IP address (including but not limited to for purposes of determining your coarse location), Device ID, MAC, software, applications, hardware, browser information, internet and online usage information and in-game information.

The foregoing data may be used and disclosed in accordance with this Privacy Policy and the privacy policy of the company providing the ad serving technology.

DUARD may display to you behaviorally targeted advertising. If you wish to "opt out" of certain targeted advertising, please inform the company to the following email – [info@duard.eu](mailto:info@duard.eu).

Please note that the links above may not reach all DUARD's advertising partners and certain behaviorally targeted advertising may still be displayed to you. If you want to be certain that no behaviorally targeted advertisements are not displayed to you, please do not use or access the Services.

Additionally please note that if you "opt out" it does not mean that you will no longer receive advertising. It just means that the advertising you see displayed will not be customized to you and your interests and may be less relevant to you.

### **3. Location Data**

DUARD does not collect and use your location data, but this does not limit the company to commence doing so. In this case, the following below will apply:

To the extent DUARD makes location enabled Services available and you use such Services, DUARD may collect and process your location data to provide location related Services and advertisements. For example, some add-ons or offers may be available at dedicated locations.

DUARD may use various technologies to determine location, such as GPS, WiFi or other network – based data such as IP address.

Your GPS geolocation is not accessed without your consent. Notwithstanding DUARD's partners who are providing location related parts of the Service, DUARD will not share your GPS geolocation with third parties without your consent. To the extent DUARD makes available GPS geolocation to third parties in accordance with this Privacy Policy, it will be provided anonymously.

### **4. Friends**

If you choose to use DUARD's "tell a friend" or a similar service about DUARD Services or order a gift certificate for your friend, DUARD may store your friend's name and contact details that you provide to DUARD.

Please note that certain features of the Services may be able to connect to your social networking sites to obtain additional information about you. In such cases, DUARD may be able to collect certain information from your social networking profile when your social networking site permits it, and when you consent to allow your social networking site to make that information available to DUARD. This information may include, but is not limited to, your name, profile picture, gender, user ID, email address, your country, your language, your time zone, the organizations and links on your profile page, the names and profile pictures of your social networking site "friends" and other information you have included in your social networking site profile. DUARD may associate and/or combine as well as use information collected by DUARD and/or obtained through such social networking sites.

### **5. Disclosure and Transfer of Personal Data**

Personal data may be disclosed to third parties in accordance with applicable legislation and this Privacy Policy.

DUARD may use third parties to collect and process personal data on DUARD's behalf and in according to DUARD's instructions. DUARD is not liable for the acts and omissions of these third parties, except as provided by mandatory law.

DUARD may also disclose your personal data to third parties when DUARD has a reason to believe that a disclosure is necessary to address potential or actual injury or interference with DUARD's rights, property, operations, users or others who may be harmed or may suffer loss or damage, or DUARD believes that such disclosure is necessary to protect DUARD's rights, combat fraud and/or comply with a judicial proceeding, court order, or legal process served on DUARD. To the extent permitted by applicable law, DUARD will make reasonable efforts to notify you of such disclosure through DUARD's website or in another reasonable manner.

## **6. Data Retention and Correctness**

DUARD retains the collected data for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Thereafter DUARD deletes all aforementioned data in its possession within a reasonable timeframe. DUARD does not verify the correctness of personal data.

Please note that some data may be further retained if necessary to resolve disputes, enforce DUARD user agreements, and comply with technical and legal requirements and constraints related to the security, integrity and operation of Services.

## **7. Cookies, beacons and tracking**

The Services may use “cookies” and other technologies such as pixel tags, locally shared objects, clear GIFs and web beacons. DUARD treats information collected by cookies and similar technologies as non-personal data.

**Cookies:** A “cookie” is a small bit of recordkeeping information that websites often store on a user's computer. DUARD’s cookies do not include personal data and are typically used to quickly identify your device and to “remember” you. You can disable cookies or set your browser to alert you when cookies are being sent to your device; however, disabling cookies may affect your ability to use the Services.

**Flash cookies & HTML5:** DUARD may also use Flash cookies (locally shared objects) and HTML5 storage (locally stored objects). Locally shared objects are small files similar to browser cookies and are used to remember your settings to personalize the look and feel of the Services. Locally shared objects only collect data in the aggregate. You may prevent locally shared objects from being placed by disabling locally stored objects in your browser or visit [www.adobe.com](http://www.adobe.com). Locally stored objects, such as HTML5 Web Storage, are used for similar purposes as cookies but typically may contain a greater amount and different types of data than browser cookies.

**Web Beacons and pixel tags:** A “web beacon” or a “pixel tag” is an electronic image that allows DUARD to count users who have visited certain pages or viewed certain advertisements. Web beacons, like cookies, do not include personal data. Emails and other electronic communications DUARD sends to you may contain pixel tags that enable DUARD to track your usage of the communication, including whether the communication was opened and/or what links were followed, if any.

## **8. Third Party Terms and Conditions**

Please note that your access to and use of the Services may be subject to certain third party and DUARD is not liable for any such third party terms and conditions and their use of your personal data.

Certain Services that DUARD may offer, such as multiplayer gaming, social networking and gaming console services, may use third party services to provide authentication for the Services with a gaming console ID, social networking ID or gaming network account. In connection with such use, certain personally identifiable user and/or membership data may be transferred automatically to and from DUARD.

DUARD may disclose your personal data to third parties in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of DUARD’s stock and/or assets or other corporate change, including, without limitation, during the course of any due diligence process provided, however, that this Privacy Policy shall continue to govern such personal data.

## **9. Safeguards**

DUARD follows generally accepted industry standards and maintains reasonable safeguards to attempt to ensure the security, integrity and privacy of the information in DUARD's possession.

## **10. Other**

You may choose to disclose data about yourself in the course of contributing user generated content to the Services.

Any data that you disclose in any of these forums, blogs, chats or the like will become **public information**, and there is no expectation of privacy or confidentiality.

DUARD does not knowingly collect any personal information from children under 13 years of age and if DUARD learns that DUARD has inadvertently gathered personal data from children under 13 years of age, DUARD will take reasonable measures to promptly erase such personal data from DUARD's records.

DUARD may store and/or transfer your personal data to its affiliates and partners in and outside of EU/EEA member states and the United States in accordance with mandatory legislation and this Privacy Policy.

## **11. Further information**

This Privacy Policy is governed by the Bulgarian law. In case of any disputes, they shall be resolved through mutual agreements. If such does not resolve the concerned issues, the dispute shall be resolved by the competent Bulgarian court.

DUARD makes good faith efforts to enable you to review, update or correct your personal data in DUARD's possession.

DUARD will need sufficient information from you to establish your identity and to verify your access request, and also to assist us in handling your request.