SPOKKO Privacy Policy

Last updated: July 4th, 2023

Overview:

- This document explains what data is collected in connection with games and services provider by Spokko until merger with CD PROJEKT S.A.
- It also explains how we use that data, where we store it, and how we protect it.
- In short:
  - in order for you to play our games or use our services we needed to process some of your data. Should we need to process your data for other purposes, we will ask you for your consent in advance.
  - Some partners help us in developing our games and services and we may share limited data with them – but only for our own purposes.
- Finally, it explains your rights in relation to your personal data.

	FULL TEXT	QUICK SUMMARY
1.	**WHO WE ARE**	
1.1	We are CD PROJEKT S.A., a company incorporated in Poland which is the data controller under European Union data protection legislation. Hereafter, we will call ourselves "**CD PROJEKT RED**". You may contact us via email at privacy@spokko.com or by mail: CD PROJEKT S.A. sp. z o.o., Jagiellońska 74, 03-301 Warsaw, Poland.	**Hello, we're CD PROJEKT RED and we are based in Poland. You can find our contact details here!**
1.2	To protect all the personal data in a better and more efficient way, we designated Data Protection Officer (or DPO) who is responsible for the oversight and implementation of the data protection strategy and ensures compliance with necessary legal requirements. You can contact our DPO at the following email address: dpo@cdprojektred.com.	**In case of any questions or doubts concerning personal data protection, please contact our Data Protection Officer (contact details opposite).**
2.	**WHAT THIS PRIVACY POLICY GOVERNS**	
2.1	This Privacy Policy applies to: all websites, games, forums, social media channels, customer and technical support and any other services provided earlier by Spokko sp. z o.o. until merger with CD PROJEKT S.A. (Hereafter, the term "**Spokko services**" will refer to all of these elements).	**This Privacy Policy explains the different kinds of data we collect from you when you're using Spokko games and services. We fully comply with privacy laws.**
2.2	Specifically, this Privacy Policy governs personal data (or, as laws. called in the United States, "personally identifiable information") and non-personal data (or, as in the United States, "non-personally identifiable information"), which we collect from you when you're using Spokko services. ("Personal data" basically means data, which, on its own or in combination with other data, can be used to identify you).	

2.3 We respect your right to privacy and will only process personal data in accordance with applicable legislation in the EU and other countries where we offer our games and services.

3. PROTECTING CHILDREN

3.1 We recognize we have a special obligation to protect personal data obtained from children. We do not and will not knowingly collect personal data from any child under 16 without consent from their parent or guardian. If you are a parent or guardian and are concerned about the transfer of personal data about your child, please contact privacy@spokko.com.

If you are under 16 and would like to use our services, a consent from your parent or guardian is necessary..

4. INFORMATION WE COLLECT

4.1 When you use Spokko services, we may collect the following data if relevant (how we use it is described later in this document):

When you use our services, we collect basic data about you and your activity.

1. Your name and surname,

2. Your email address,

3. Any username used to identify yourself in any of our services,

4. Your Witcher ID,

5. Details of your digital platform account regarding our games, but not any financial details,

6. IP address

7. Technical details about any device which you use to access our services, including: Internet and/or network connection; any mobile device identifier; your operating system, browser type or other software; or your hardware or other technical details. This is technical data about our users and their actions and patterns which does not provide personal data,

8. Details of your use of our services including, but not limited to: metrics data about when and how you use the services; traffic data; and your approximate geographical location data,

9. Details about your use of social networks and our services (if you have linked our services to a social networking account or you visit our official profiles in social media). This may potentially include certain data from Facebook or other social networks (including access to your friends list as well as aggregated non-personal analytics data about our users) strictly in accordance with Facebook's and other networks' terms and conditions – in the extent necessary to provide you with all functions of Spokko games and services; and

10. Any other data which you supply us via our services.

4.2 If you contact our technical support (directly or using crash reporting functionalities in our games or services), we may process other data required to help you with any queries

If you contact technical support they may ask you to provide them with some

or support matters, such as data collected in crash logs that are gathered by your device or the technical parameters of the device you use to play.

additional data, including your crash logs or the technical details of the device you use.

4.3 For the purposes of competitions and events organized by Spokko, we may process additionally your correspondence address, phone number, social networks identifiers, image of yourself, bank account number and other data necessary to conduct a given contest, indicated in the rules of the respective contest.

If you participate in competitions organized by us, we may need some additional data about you.

4.4 We may also collect some non-personal data about our users (statistical information on usage of our games and services, information on devices used to connect to them) in order to better understand how our games and services are used and to improve them based on this knowledge.

4.5 In order to enable you to play our games and use our services, we need to process data provided above. Processing of the aforementioned data is not obligatory, however necessary to play our games, participate in competitions and events or use other services.

The above data is necessary for us to provide you with our services.

4.6 Cookies. We and our partners also collect data about you via cookies. To find out more about how we use cookies and to manage your cookies-related consents, please check the link to our “Cookie Declaration” which you can find in the footer of our web pages.

Check our Cookie Declaration to find out what sorts of cookies we use to support our services.

5. HOW DATA ABOUT YOU IS COLLECTED

5.1 We may collect and process data about you in the following ways:

a. data you give us via Spokko services;

b. data we may obtain form operators of platforms you use to interact with Spokko services, provided to us under the terms of respective platforms;

c. data given when you contact us or report a problem with Spokko services;

d. data about your activity as a user of our services (in addition to your IP address, country of origin, purchases, account of in-game virtual goods and currencies) - is collected automatically;

e. we may also ask you to complete surveys that we use for research purposes. However, your response to surveys is not required. We may collect this data via Spokko services or trusted partners connected with us for optional services such as surveys or polls.

We collect and process data that you give us in connection with our games and services or that we receive in connection with your activity within the game.

5.2 A quick word about payment details (if/when you use them): We will not receive or store any of your payment details, this is fully handled by the relevant payment platform an/or payment method/processor. If/when you make any purchases in Spokko services, we are notified by the payment processor once the

We do not collect any of your payment details. We only receive data that a purchase took place and ensure you receive what

transaction takes place and then ensure you receive your purchase. We do not, however, receive any of your actual payment details. We only keep the data concerning transaction dates, currencies, value and the products of transaction.

you purchased. The only data we store includes transaction dates, currencies, value and products of transaction.

6. WHY DO WE USE YOUR DATA (LEGAL BASIS FOR DATA PROCESSING)

6.1 When we process personal data about you, we do so only as necessary to provide Spokko services you use (i.e. to perform the agreement between us), to meet our legal obligations or to fulfill the so-called "legitimate interests" of Spokko, or for other reasons described in the section "How is your data used?". To clarify, by legitimate interests we mean lawful purposes that could be reasonably expected (protecting the security of the data we process, conducting anti-cheat analysis and anti-fraud checks, and improving quality of our products). When we rely on the legitimate interest, we consider and balance any potential impact on you and your rights. For other purposes (like marketing of Spokko games and services), we will ask for your consent and you will be entitled to withdraw this consent at any time with no impact on the validity of the processing before your consent has been withdrawn.

In order for you to play our games and use our services, or to meet our legal obligations, we need to process some of your data. Should we need to process your data for any other purpose, we will ask you for your consent in advance. You will always have the right to withdraw your consent at any time.

6.2 When we transfer your data outside the European Economic Area, we do so on the basis of a variety of legal mechanisms, as described in "Trusted Partners".

7. HOW DO WE HANDLE YOUR PERSONAL INFORMATION

7.1 **Where do we store it?** The data we collect from you is stored on our secure servers in Europe or – only if necessary - by those of our Trusted Partners as described below. We implement appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction or damage. We will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

We will store your data on our secure servers in Europe or on those of our Trusted Partners. We will do our best to keep your data secure.

7.2 **How long are we going to store your data?** We will retain your personal data only for as long as needed in order to fulfill the purposes outlined in this Privacy Policy. In certain special cases, a longer retention period might be required by law, such as for tax reasons, accounting purposes or other legal requirements and obligations. When we will no longer require your personal information in order to provide our game related services to you, we will either delete it or anonymize it:

In general, we will store your data until you use our services. After that we may still use limited data about you for tax, legal or accounting reasons.

a. we will keep data that is associated with the services you use for the duration of the agreement to access the services (e.g. Spokko games). Following account closure, limited data that we collect about you will still be retained for additional few years for tax, legal or accounting purposes and for exercise or defence of legal claims;

b. if you contact us and don't use our services, we will retain correspondence with you as long as necessary to assist you,

followed by a period necessary for legal or accountability purposes;

c. for marketing purposes, we will store data as long as we have valid consent, and in case you withdraw your consent, we will remove data without undue delay and no later than within 30 days from the moment we receive your request.

8. HOW IS YOUR INFORMATION USED

8.1 Your data may be used for the following purposes:

We will use your data to operate Spokko services and continue to improve them, as well as to communicate with you (e.g. via newsletters or emails).

a. To carry out our obligations arising from any agreements between you and us.

b. To provide you with marketing information (including personalized and targeted marketing emails), which we feel may interest you. For example, we may send you newsletters or emails about Spokko services (of course, this is optional and we will ask you for permission first).

c. To provide you with products or services that you request from us.

d. To communicate with the users of our services.

e. To allow you to participate in interactive features of Spokko services when you choose to do so.

f. To notify you about changes to Spokko services.

g. To maintain, improve or modify Spokko services.

h. To conduct competitions organized by Spokko (including contact with participants, evaluation of applications, distribution of prizes, payment of tax on prizes).

i. To calculate conversion rates and other elements of Spokko services' performance.

j. For tax, legal and accounting purposes.

k. For the accountability purposes as defined by EU legislation (GDPR).

l. To target and personalize our marketing communications, offers and advertisements that we display on our websites and services as well as those of third parties based on the combined data we have collected about you.

8.2 Whenever we're personalizing or targeting our marketing communications, offers and advertisements, we may profile your personal data, which means that we may use the data we collect to adjust the communication addressed to you to meet your needs. In such cases, we do not, however, use your personal data for profiling, which would constitute automated decision-making that could affect your legal situation (i.e. we do not use

We gather data about when and how you use Spokko services in order to offer you the best service possible. However, we will never make automatic decisions based on profiling

algorithms to make decisions which would have an impact on your individual legal rights or affect your legal status or rights under the agreement between us. For example we do not make automatic offers based on your behaviour in the game).

If you decide that you no longer want to receive personalized offers, product recommendations from us, or any advertising news at all, you can object to this service at any time.

that could affect your legal situation (e.g. automatic offers or discounts based on your behavior in the game).

8.3 We might process some aggregated and general non-personal data on user behaviour (e.g. sales per region) with third party partners who work with us to provide Spokko services to you (for example, with payment providers) in order to support, improve or amend Spokko services. We may also share non-personal data with data analysis services to help us run Spokko services.

Sometimes we may have to share anonymised, non-personal data like operating system type in order to run our services. Fear not, as mentioned above, everything's anonymised, so you can never be identified.

9. DATA SHARING

9.1. Please remember that any communications you have via Spokko services may reveal details about you. Also, any data you post publicly using Spokko services will be publicly available to Spokko users and others. We are not responsible for your use of any private personal data which you choose to make available via Spokko services, or the activities of other users or other third parties to whom you give or make available your data.

When you're using Spokko services which allow sharing own personal data with others or publicly, be aware that you are responsible for this type of data sharing.

10. THIRD PARTY INFORMATION COLLECTION AND EXTERNAL SERVICES

10.1 Spokko services may, from time to time, contain links to and from the websites or services of third parties. Our Privacy Policy does not extend to these external sites or companies, so please refer directly to their privacy policies.

You may find third party links in Spokko services, or we might direct you to third parties. They may collect data from you in accordance with their own privacy policies. Please be sure to take a look at them.

11. OUR TRUSTED PARTNERS

11.1 We may share your data with the following Trusted Partners, who were engaged by us to help deliver our services and functionalities to you. Please rest assured that we always provide our partners with the minimum data necessary for them to achieve the purpose of their cooperation with us. They may have access to limited data about you and process it on our behalf for only the purposes set out below (they are formally called "Data Processors"):

We sometimes share data with our Trusted Partners. They usually take care of stuff like data analytics, internal management tools or support us in marketing activities.

a. Mapbox, Inc. – our partner providing us with solutions for displaying the game map;

b. Google LLC – our partner supporting us in providing The Witcher Monster Slayer;

c. Our partners responsible for providing, managing and maintaining network infrastructure, allowing smooth experience during playing our games in different territories;

d. Our partners who provide us with internal management and data-sharing tools;

e. Our partners who help us in data analysis by providing us with analytical tools;

f. Our partners who help us manage our newsletters and email communications by providing us with email marketing tools;

g. Our professional advisors who assist with legal, tax, audit or accounting matters;

h. Advertising partners for the purpose of personalized and targeted marketing (for example, to inform via advertisements on websites you visit about our services you may enjoy).

11.2 When required by law, we may also share your data with the police or other government authorities (including your IP address and details of suspected unlawful or fraudulent activity such as unauthorized use of payment methods and security risk scores).

11.3 Your data may be processed, stored and transferred to countries outside your country of residence and beyond the European Economic Area (EEA), such as the United States. Privacy laws in these countries may not offer the same level of protection as in your country or in the EEA. But whenever we share your personal data outside the EEA, we will do so on the basis of appropriate legal measures, like EU standard contractual clauses, which are lawful measures to transfer your data and establish adequate protection of your personal data.

Whenever we share your personal data outside Europe, we make sure that the data is duly protected.

12. PUSH NOTIFICATIONS

12.1 If you use our mobile games then, with your prior approval, we may send push or local notifications to your mobile device to give you updates regarding those games. You can manage this from your device's Settings section.

We can use mobile push notifications if you approve it.

13. OTHER STUFF

13.1 Please be aware that we are subject to various laws and may be required to release personal data to comply with law enforcement and other legal requirements.

Może się tak zdarzyć, że będziemy musieli ujawnić pewne dane osobowe na żądanie uprawnionych organów państwowych.

13.2 In the unlikely event of a reorganization or merger of CD PROJEKT RED we may transfer personal data to an involved third party who will protect to at least the same level as we do in this privacy policy.

In the event of any reorganizations, acquisitions, etc., your personal data will still be protected to at least the same level as it is right now.

14. YOUR RIGHTS

14.1 You have the right to object to the processing of your personal data in certain situations and for marketing purposes at any time.

You can do so by contacting us on the email address: privacy@spokko.com.

14.2 You have the following additional rights:

a. You have the right to access data held about you;

b. You may contact us to request that we delete your personal data from our systems;

c. You may ask us to rectify/correct your personal data, if appropriate.

d. You may ask us to restrict the processing of your data;

e. You have the right to transfer your data to another entity;

f. You have the right to file a complaint with a data protection authority.

You have a number of rights regarding your personal data. They include the rights to access your data (i.e. request information on how your personal data is used), to make amendments in it, to have us delete your data, to restrict the processing of your data or to have your data transferred to another entity. In any case you can always send an email to privacy@spokko.com and we will do our best to support you.

You can exercise these rights by contacting us at privacy@spokko.com.

You can also delete your account and associated data through the dedicated button in the game settings menu.

14.3 In case of any concerns or questions about your privacy, please do contact us and we will do our best to assist you. You can reach us at: privacy@spokko.com. If, however, you feel we have not satisfactorily dealt with your concern, you can report it to your local data protection authority or the Polish regulator – the President of Personal Data Protection Office - Prezes Urzędu Ochrony Danych Osobowych ("PUODO") in Poland.

14.4 If you would like to exercise any of these rights or have any queries regarding them, contact: **privacy@spokko.com.**

15. CHANGES TO THIS PRIVACY POLICY

15.1 We may change this Privacy Policy if we deem it necessary for legal reasons or to reflect changes in our services. If we do so, we will make the altered Privacy Policy available online and update the “Last Updated” date.

We can change this Privacy Policy, but if we do so, we will put the changed version online. Please feel free to contact us if you have any questions regarding these changes.

16. USER AGREEMENT

16.1 We would also like to remind you that separate terms of services (like The Witcher Monster Slayer Terms of Service) may apply to respective Spokko services. Such documents may provide more information on how to use respective services. We encourage you to read these documents as well.

Final note: please remember to also read the respective terms of a given Spokko service you intend to use.