

PRIVACY & PERSONAL DATA PROTECTION TERMS

These Privacy & Personal Data Protection Terms ("Privacy Policy") are an integral part of the "Terms of Use" (available here: <https://sqillerapp.com/terms.pdf>) and set out the terms on which we process your personal data as well as our privacy obligations to you.

I. Policy-Specific Definitions

In addition to the terms already defined in the "Terms of Use", data processing terms, whether or not they are capitalized, shall be defined as in the General Data Protection Regulation (EU Reg. n° Regulation (EU) 2016/679).

II. Data Processing Principles

We process your personal data in conformity with the following principles:

- 1) Lawfulness, fairness and transparency : in compliance with all the relevant laws, fairly and in a transparent manner
- 2) Purpose limitation : only for specified and legitimate purposes as described in this Privacy Policy
- 3) Data minimization : only what is needed for the purposes defined in this Privacy Policy
- 4) Accuracy : in a way that reflects accurately on the situation in fact
- 5) Storage limitation : only until the data is needed for the purposes defined in this Privacy Policy
- 6) Integrity and confidentiality (security) : in a confidential and secure manner, that seeks to prevent unauthorized or unlawful processing, loss, destruction or damage to your data
- 7) Accountability principle : keeping records of our compliance with these principles and our relevant requirements

III. Data Controllers & Data Processors

The data controller for your personal data is, unless otherwise specified:

TEQBALL Korlátolt Felelősségű Társaság, a company registered in Hungary at the Fővárosi Törvényszék under n° 01-09-174699, having its registered address at Expo tér 5-7, Budapest 1101, Hungary, represented by Mr. Viktor Huszár, Director.

Data processors are identified in the tables below, and may also act as data controllers on the same set of data but not under any instructions from us to process your personal data, in particular when you have already created an account with them separately. Their respective privacy terms when acting as data controllers are available on their own websites.

IV. Data Processing Purposes & Legal Basis

Your personal data is processed for the purposes and according to the methods defined in the tables below, depending on the category of data:

1) REGISTRATION / LOGIN DATA (Via EMAIL)

Data Collected	When/Where Data Captured	Our Use	Your Benefit	Legal Basis	Storage Period	Data Processors and their Uses
name	provided by you when you request to download Digital Content	more readable account name	for your ease of reference instead of numbers	consent	5 years after inactivity	MGL Creative KFT (Budapest, Hungary: database hosting & maintenance)
email address		contact information, account identification	functionality	contract		
country		internal regional statistics	possible improved regional variations in upcoming releases	legitimate interests		
name, email address, country		partnering with FITEQ	information about joining FITEQ relevant to you based on your interest in the Digital Content	consent		FITEQ (Fédération Internationale de Teqball, Lausanne, Switzerland: membership marketing)

2) REGISTRATION / LOGIN DATA (Via FACEBOOK)

Data Collected	When/Where Data Captured	Our Use	Your Benefit	Legal Basis	Storage Period	Data Processors and their Uses
Facebook account name, profile image	Login info provided by you when you chose to register/sign in via your Facebook account ; Facebook account image and list of Facebook friends also using the Digital content are provided as a result of the subsequent communication with Facebook's API servers	more readable account name	easier method of providing your chosen name and image versus entering it manually	consent	5 years after inactivity	Facebook Inc. (Menlo Park, CA, USA, and/or its group entities: targeted marketing & other purposes further defined here: https://www.facebook.com/business/m/one-sheeters/gdpr-developer-faqs)
Facebook friends who also use the Digital Content		ability to provide more engaging battle game flow	ability to engage in battle challenges against your Facebook friends in an easier and more direct way			
name	name provided by you when you register via Facebook; email and country provided by you when you choose to add this information to your account	more readable account name	for your ease of reference instead of numbers	consent		MGL Creative KFT (Budapest, Hungary: database hosting & maintenance)
email address		contact information, account identification	functionality	contract		
country		internal regional statistics	possible improved regional variations in upcoming releases	legitimate interests		
name, email address, country		partnering with FITEQ	information about joining FITEQ relevant to you based on your interest in the Digital Content	consent	FITEQ (Fédération Internationale de Teqball, Lausanne, Switzerland: membership marketing)	

3) CONTENT USE DATA

Data Collected	When/Where Data Captured	Our Use	Your Benefit	Legal Basis	Storage Period	Data Processors and their Uses
Image analysis data	during gameplay	in-game profile points and rankings, cheat prevention	Improved account functionality and user experience	consent	5 years after inactivity	PlayFab Inc (part of Microsoft Corporation, Redmond Washington, USA : targeted marketing & other purposes further defined here: https://api.playfab.com/docs/tutorials/landing-analytics/data-collection)
Video of gameplay	during use of the gameplay share function	ability to provide added feature	“Q coin” rewards; ability to review and share video of gameplay later	consent		Any compatible social media program installed on your device (e.g. Facebook, Twitter, Instagram) that you choose to share it with (please cf. their respective data policies for further info)

V. YOUR RIGHTS

You have the following rights in relation to your personal data:

4) Right to be informed

You have the right to be informed about the collection and use of your personal data in a clear and transparent way. Please consult the table above in clause III Data , or, in case of questions, contact our DPO (contact details in clause VI ACCOUNTABILITY).

5) Right to access

You have the right to request access to your personal data and obtain information regarding the purpose of processing, what categories of personal data are processed, data processors, length of processing, your rights relating to our processing, your right to lodge a complaint with a supervisory authority regarding our processing, information on third party sources of your personal data communicated to us, and the existence of automated decision-making and related information, including the logic involved, as well as the significance and the envisaged consequences of such processing for you, whether your personal data is transferred outside the EEA, and the conditions of these transfers.

6) Right to rectification

You have the right to request rectification or completion of your personal data.

7) Right to erasure

You have the right to request erasure of your personal data without delay if:

- your personal data is no longer necessary for the purpose under which it was collected;
- you withdraw your consent and there is no other legal basis for processing;
- you object to the processing and there are no overriding legitimate grounds for the processing;
- your personal data has been processed unlawfully;
- your personal data has to be erased according to relevant laws.

Please note that we are entitled to not erase your personal data if it is necessary for legal or regulatory purposes.

8) Right to restrict processing

You have the right to restrict processing of your personal data if:

- you have contested the accuracy of your personal data, for a period enabling us to verify the accuracy of your personal data;
- the processing is unlawful and you oppose the erasure of your personal data and request the restriction of its use instead;
- they are required by you for the establishment, exercise or defense of legal claims.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims, for the protection of the rights of another natural or legal person, or for reasons of public interest as such is defined in the EU.

9) Right to object to processing

Where personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You also have the right to object to the processing of personal data where the legal basis of processing activity is our legitimate interest, or the legitimate interest of a third party.

10) Right to data portability

You have the right to receive the personal data in our possession or control in a structured, commonly used and machine-readable format, and have the right to transmit that data to another data controller without hindrance from us. You also have the right to have your personal data transmitted directly from us to another data controller where technically feasible.

11) Right to withdraw your consent

You have the right to withdraw any consent you have given at any time, without affecting the lawfulness of processing based on your consent given previously.

12) Rights related to automated decision making including profiling

No automated decision making is carried out based on your data.

13) Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the (governmental) authority supervising data protection in your jurisdiction.

VI. **ACCOUNTABILITY**

For queries relating to your data or this Privacy Policy, please contact our data protection officer (DPO):

Mr. Gergely Murányi

+352-26-11-18-1

dpo@teqball.com

Data Compliance, Teqball International Limited, 16/17 College Green, Dublin 2, D02 V078, Ireland

VII. **DATA SECURITY**

When you submit personal data online or via an application you accept the unavoidable risks associated with such technologies. WE DECLINE ALL LIABILITY RELATING TO LOSS OR CORRUPTION OF YOUR PERSONAL DATA AND ANY CONSEQUENCE THEREOF, unless we have breached the standards of care required of data processors based in the EU.

VIII. **INTERNATIONAL DATA TRANSFERS**

Some of your personal data is transferred automatically to data processors (cf. list in table at clause III Data) based outside of the EEA. Every one of these, however, is covered by the EU-US “Privacy Shield Framework” certifying that these data processors provide “adequate” protection of your personal data which, in the view of the EU Commission, is sufficiently protective to allow your personal data to be transferred to them. For more information on any of these data processors and their compliance with the Privacy Shield, please go to this link: <https://www.privacyshield.gov/list>.

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