

## **Privacy notice of RNDM**

### **I. Controller, Scope**

RNDM is provided by Pink Frog Games GmbH Besselstrasse 14 10969 Berlin (hereinafter also referred to as "Provider"), acting as Controller in accordance with relevant data protection provisions. Please find full company and contact details in the relevant section of the RNDM-app.

We hereby inform you about which data we collect when, and how we process your personal data. This privacy notice describes the collection and processing of personal data when using the RNDM-app (hereinafter referred to as "App").

### **II. General information**

#### **1. Purposes of processing**

In principle, we only process personal data of users as necessary to provide a functional App, our contents and to deliver our services.

#### **2. Legal basis for the processing of personal data**

We mostly process personal data according to on one of the following legal bases:

##### **consent**

Whenever we collect the data subject's consent to the processing of personal data, Art. 6 para. 1 a EU General Data Protection Regulation (GDPR) serves as the legal basis.

##### **legal obligation**

If the processing of personal data is necessary for compliance with a legal obligation which the Controller is subject to, Art. 6 para. 1 c GDPR serves as the legal basis.

##### **contract or pre-contractual measures**

If the processing of personal data is necessary for the performance of a contract to which the data subject is party, Art. 6 para. 1 b GDPR serves as the legal basis. This also applies to processing operations that are necessary to carry out pre-contractual measures.

##### **legitimate interests**

If processing is necessary for the purposes of the legitimate interests pursued by the Controller or a third party and if such interests are not overridden by the interests, fundamental rights and freedoms of the data subject, Art. 6 para. 1 f GDPR serves as the legal basis.

#### **3. Data erasure and retention time**

In principle and unless otherwise stated, your personal data will only be stored until the purpose of the collection and storage is achieved. If the storage is based on your consent, personal data can be stored as long as you do not revoke such consent.

Furthermore, data may be stored if it is required by European or national legal provisions, laws or regulations which we are subject to. Personal data will be blocked or deleted if the retention period set forth by the any such regulations expires, unless further storage is necessary for the conclusion or fulfilment of a contract.

#### **4. Transfer to third countries**

Unless otherwise stated, all data processing operations take place within the EU or the EEA countries.

Data processing operations carried out by third-party providers established outside the mentioned geographical area may be carried out in part or in full in the countries the respective providers are based in, in accordance with the relevant and applicable data protection regulations.

A transfer of personal data outside the EU or the EEA shall only take place on the basis of on an adequacy decision of the European Commission or subject to appropriate safeguards, such as standard data protection clauses adopted by the European Commission.

### **III. Processing of data**

Our app is currently in test mode. To use it, you may not create any user account nor provide any personal data. We only collect interaction data on the way you have used our app. Such information is not referred to you as an individual and does not allow for your identification.

#### **IV. Data Processors**

In our current test mode, we do not cooperate with any third-parties except those mentioned in the section below.

#### **VI. Use of identifiers**

##### **1. Description and scope of data processing**

In order to improve user experience of our App and to enable selected functions, we implement tracking technologies, allowing us and/or our partners to identify your device (hereinafter jointly referred to as “Identifiers”). Identifiers are usually small data sets being stored on or associated to your device. Some of the Identifiers we use expire after the end of the session, i.e. after you exit the App (session Identifiers). Other Identifiers remain on or associated to your device and enable us or our partner companies to recognise your device whenever you use the App (persistent Identifiers). You can set your device preferences in order to be notified about the use of Identifiers and decide individually about accepting or refusing them in certain cases or generally. Failure to agree to the use of Identifiers may result in limitations or in complete unavailability of our services.

##### **2. Strictly necessary Identifiers**

Some of the Identifiers we use are strictly necessary to allow us to deliver the service you requested or to operate our App. Some elements of our App require that your device be identified throughout the use of the App. Such technical Identifiers may collect personal information about you, such as IP address, log-in information, App engagement data, App purchase data.

The processing of personal data through strictly necessary Identifiers – if any – is art. 6 par. 1 lit. f) GDPR. In case such Identifiers are necessary as a pre-contractual measure or for performing a contract with you, the legal basis is art. 6 par. 1 lit. b) GDPR.

### **3. Other Identifiers**

In addition, we use third-party Identifiers to monitor and evaluate user behaviour for statistics and market analysis purposes. Such Identifiers are provided by third parties and implemented in our App. Please refer to the following sections for details. Such Identifiers allow us to analyse your use of our service and improve it continuously. Analytics allow us to offer you a better service that meets your interests better.

Unless otherwise specified, the legal basis of processing through other Identifiers mentioned below is your consent pursuant to art. 6 par. 1 lit. a) GDPR. Unless otherwise specified, the lifetime of Identifiers used based on your consent expires upon withdrawal of your consent.

#### **GOOGLE ANALYTICS FOR FIREBASE**

Google Analytics for Firebase or Firebase Analytics is an analytics service provided by Google Ireland Limited. To find out more about Google's use of data, consult [Google's partner policy](#). Firebase Analytics may share Data with other tools provided by Firebase, such as Crash Reporting, Authentication, Remote Config or Notifications. On our App we use Identifiers to run the Firebase Analytics service. You may opt-out of certain Firebase features through applicable device settings, such as the device advertising settings for mobile phones or by following the instructions in other Firebase related sections of this privacy policy, if available. Personal Data processed: Identifiers (Google Advertiser ID or IDFA, for example); Usage Data.

Place of processing: Ireland – [Privacy Policy](#).

### **XIII. Data Subjects' rights**

As a data subject, you have the following rights pursuant to the GDPR:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.

**Your right to notification** - If you have exercised your right to have the Controller rectify, erase, or limit the processing, the Controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data concerning you have been disclosed, unless this proves impossible or involves disproportionate effort. You have the right to be informed about those recipients.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances. Please find further details in the box below this section.

**Your right to withdraw consent** - You have the right to withdraw your consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Your right to data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please reach out for us at the contact details indicated on the App if you wish to make a request.

**Your right to file a complaint**

You can also complain to a data protection authority if you do not agree on how we have used your data.

<p><b>You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6(1)(e) or (f) GDPR; this also applies to profiling based on those provisions. The Controller shall no longer process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.</b></p>
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**XI. Amendments to this privacy notice**

Due to the dynamic development of the Internet, new technologies and possibilities are constantly developing. To enable us to offer you these possibilities and technologies, we reserve the right to change this privacy notice for the future when introducing new, additional or when changing or extending existing services or service elements. The new privacy notice shall apply from the date of its update on the App.