

# Privacy Policy of Rudy Games GmbH

(Company registration number FN 399509p Linz Regional Court)

As of 2022-02-09

## 1. In General

- 1.1 We, the team of Rudy Games GmbH, FN 399509p, Blumauerstraße 35, 4020 Linz, Austria (see A. Imprint) - hereinafter also called "Rudy Games", process your personal data when you use our apps, our hardware devices or our website - hereinafter also called "Products". The processing of your personal data takes place in compliance with the General Data Protection Regulation („GDPR“) and the Austrian data protection act in its current form.
  
- 1.2 In this privacy policy we want to provide you with information about the nature, scope and purposes of the data collection and use, giving you an insight into the processing of your personal data by Rudy Games.

## 2. Controller

### 2.1 Controller

The controller for the data processing within the meaning of the GDPR is Rudy Games. You can contact us via mail under our email address ([hello@rudy-games.com](mailto:hello@rudy-games.com)) with any concerns about our privacy policy.

### 2.2 Data Protection Officer

Our data protection officer within the meaning of the GDPR can be contacted under our email address ([hello@rudy-games.com](mailto:hello@rudy-games.com)). Should you have any questions regarding the processing of your personal data, please do not hesitate to contact him/her

### 3. Which data we process

#### 3.1 In General

Rudy Games processes such personal data, that you as a user of the Products make available to us, for example by using our Products, and that others provide to us.

#### 3.2 Data you provide to us

**Mandatory Information:** You have to provide us with certain information in order to register to use most of our products:

- e-mail address

In order to purchase a physical or digital product in the Rudy Games webshop, you have to provide additionally data, such as the following:

- first and last name
- shipping and billing address, zip, city, country
- phone number (for the shipping service e.g. DHL, GLS, ...)
- payment information: We use payment providers (e.g. Stripe, PayPal, Klarna a.o.) to process payments. Although we do not store any payment credentials information ourselves, we store a payment ID number that is given out by the respective provider and can be allocated to a person by that payment provider.

**Optional Information:**

Certain information is optional during registration and can also be added later on by you or can be made available by giving certain rights in the app, such as:

- first and last name
- date of birth
- address
- profile pictures
- other personal data, e.g. to create personalized gaming content

#### 3.3 Data from others

The following personal data we retrieve from external services, without being explicitly provided by the user:

- IP address
- language based on the settings of the browser or device settings
- country based on the language or language settings of the browser or device settings
- GPS position based on the GPS data of the device

## **4. Usage of external services and data transfer of third parties**

### **4.1 Service use**

#### **Hosting**

The online services of Rudy Games use the technical infrastructure of the hosting provider Hetzner Online GmbH. In order to use these online services and services, information about your use of these services is usually transmitted to a Hetzner server in Germany, processed and stored there. Therefore personally identifiable data entered by a user will be transmitted to this partner. All personal data are processed by this partner on behalf of Rudy Games and serve only to provide the services offered by Rudy Games and the tasks associated with these services. The privacy policy of this partner can be found here:

<https://www.hetzner.com/rechtliches/datenschutz>

#### **Caching und Content Delivery Network**

To enhance the performance and availability of Rudy Games websites, we use the Caching Service and Content Delivery Network of the US-located company Cloudflare Inc.. The information generated by using our websites about your use of these websites are usually transmitted to the servers of Cloudflare and stored there. All personal data are processed by this partner on behalf of Rudy Games and serve only to provide the services offered by Rudy Games and the tasks associated with these services.

Information on Third-Party Provider. Cloudflare Inc., 101 Townsend St., San Francisco, CA 94107. USA.

Terms: <https://www.cloudflare.com/website-terms/>

Privacy Policy: <https://www.cloudflare.com/privacypolicy/>

#### **Google Analytics and API's**

*General.* Rudy Games products use Google Analytics and API's, these are web-based services of Google Inc. Google Analytics and API's uses cookies. The information on your usage of the Products created by a cookie or API request, will usually be transmitted to a Google server in the USA and stored there. In case of the activation of the IP-anonymization in the Products, your IP-address will be shortened by Google beforehand within member states of the EU or other members of the Agreement on the European Economic Area. Only in exceptional cases the entire IP-address will be transmitted to a Google server in the US and shortened there. On behalf of the operator, Google will use this information in order to evaluate your use of the Products, compose reports on the Product activities, and provide further services to the operator related to the Product and internet usage. The IP-address transmitted by your browser or app within the use of Google Analytics and API's will not be combined with other data held by Google.

*Opt-Out.* You can prevent the collection of data through the cookie concerning your use of the Products (incl. your IP-address) as well as its processing of this data by Google, by downloading and installing the following browser plug-in:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

*Anonymize IP.* The Products use Google Analytics and API's in conjunction with the option "anonymizeIP()". This means, IP-addresses are processed in a shortened form in order to prevent transmission of any personal data. Any connection with a specific person is therefore precluded and personal data immediately deleted.

*Purpose.* Rudy Games uses Google Analytics and API's to analyze and be able to constantly improve the use of Rudy Games Products. Through the statistics, Rudy Games is able to improve its services and make them more interesting for users and to optimize new features and products. In those special cases in which personal data is transmitted to the USA, Google is certified via EU-US privacy shield. The basis for the processing is Art 6 sec 1 subsec f GDPR.

Information on Third-Party Provider. Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001; Terms: <https://www.google.com/analytics/terms/gb.html>; overview on data protection: <https://support.google.com/analytics/answer/6004245?hl=en>; and Privacy Policy: <https://www.google.com/intl/de/policies/privacy/>.

### **Webshop Fulfillment/Shipping/Tracking**

For the (partially) automated handling of Rudy Games orders, Rudy Games transmits for the shipping required data to the carrier of choice. Rudy Games primarily works with DPD, DHL, GLS and the General Austrian Mail Service (Österreichische Post). In certain countries or regions, Rudy Games uses dropship-services, such as Logsta, for faster and easier fulfillment of orders. In these countries and regions, Rudy Games will transmit required information (such as name, shipping address, e-mail address and phone number) solely for the purpose of the fulfillment of the order. Rudy Games currently works with Logsta and Amazon, but reserves the right to add additional providers in the future.

### **Payment Service Provider**

All payments to Rudy Games are handled by external payment providers (Such as Stripe, PayPal, Klarna, ...). With these companies we exchange all required data for completing payments. The following information will be exchanged with the Payment Service Provider:

- E-mail address
- First name and last name
- Address, zip, city and country (for fraud verification)
- Payment information (e.g. credit card number)

Rudy Games never stores any payment data (e.g. credit card numbers) but leaves this up to the carefully selected payment providers. They store the payment data securely.

### **Billing and accounting services**

As part of the billing, accounting and tasks associated with these services Rudy Games uses the cloud-bases software Easybill as well as the tax and business consultant Raml und Partner. All data for a legally compliant accounting process are transmitted by Rudy Games to these partners and stored and processed by them. Therefor personal data entered by a user during the ordering and check-out will be transmitted to these partners. All personal

data are processed by this partner on behalf of Rudy Games and serve only to provide the services offered by Rudy Games and the tasks associated with these services.

The privacy policy of this partners can be found here:

Easybill: <https://www.easybill.de/privacy>

Raml-Partner: <http://www.raml-partner.at/datenschutzerklaerung>

Rudy Games remains the right to add additional billing and accounting service providers.

### **Customer Service Software**

*Zendesk.* Rudy Games uses the cloudbased customer support software Zendesk, in order to manage and answer customer requests via email, live chat or any other support channel. All requests will be sent to, stored and processed by Zendesk. All personal data sent through a customer support request will therefore be transmitted to Zendesk. Additionally, Zendesk stores the following information:

- Language (through automated language detection)
- IP-address

Rudy Games offers in her Products the option of live chat with the customer service team. To accomplish this Rudy Games uses a software from Zendesk. All data being transmitted through the live chat, will be stored and processed by Zendesk. Therefore personal data entered by a user will be transmitted to Zendesk. Aside from data entered by the user, Zendesk will automatically store the following data:

- Language (based on the settings of the browser or device settings)
- IP-address

All personal data are processed by Zendesk on behalf of Rudy Games and serve only to provide the services offered by Rudy Games and the tasks associated with these services.

The privacy policy of Zendesk can be found here:

<https://www.zendesk.com/company/customers-partners/privacy-policy/>

### **E-Mail-Services**

In order to send emails (aside from newsletters) Rudy Games uses the following external software and services:

- Upviral
- Microsoft Office 365
- Amazon Mail Services
- Sendinblue

For the usage of the above service, the customers E-mail-address, the language, first name and last name are being transmitted to the service provider. These personal data are processed by Upviral, Microsoft, Amazon and Sendinblue on behalf of Rudy Games and are only used to process e-mails.

To analyze the performance of e-mails (e.g. delivery rate, ...) these systems use a pixel tracking mechanism, which can be used to track the time at which recipient opened an e-mail or clicked on a link in the e-mail.

The privacy policy of these partners can be found here:

Upviral: <https://upviral.com/privacy-policy/>

Microsoft Office 365: <https://privacy.microsoft.com/en-us/privacystatement>

Amazon Mail Services: <https://aws.amazon.com/privacy/>

Sendinblue: <https://www.sendinblue.com/legal/privacypolicy/>

### **E-Mail Verifikation**

In order to verify email addresses Rudy Games uses the software QuickEmailVerification. This cloudbased software only receives the email address to process it upon automated request from Rudy Games.

The privacy policy of QuickEmailVerification can be found here:

<https://quickemailverification.com/privacy>

### **Other services**

Beside the services mentioned above Rudy Games may use additional services to ensure high quality of all Rudy Games Products (e.g. caching services to reduce the response time of requests). It might be the case that personal data is transmitted to those services. Rudy Games pares the transfer of this data down to the minimum which is required for using the services. The external services process the data on behalf of Rudy Games and do not use the data for their own benefit.

## **4.2 Marketing services**

### **Retargeting**

Our websites and apps use retargeting technologies. This allows us to display advertising on partner websites to customers who previously were interested in Rudy Games Products. We are convinced that personalized and interest-based advertising is more interesting and relevant to our customers, compared to advertising without and relevance for the customer. Retargeting technologies analyze the information captured through interactions with Rudy Games Products as well as through cookies, and displays advertising based on the user's surf behavior online. More information about cookies can be found in section 5.

Rudy Games uses remarketing services from Google and Facebook. Rudy Games remains the right to add additional remarketing providers.

### **Affiliate marketing**

Rudy Games also works with Affiliate Marketing Services (Affilinet, Share a Sale, Zanox,...),

who display advertising on partner websites. These providers can store data about your usage of Rudy Games Products.

## **5. Cookies and Plug-Ins**

### **5.1 Cookies**

#### **What are Cookies?**

The Website use 'cookies' – small text files that are placed on your computer, mobile device and/or stored by the browser. If the respective server of our website is again accessed by the user, the user's browser sends the afore received cookie back to the server. The server can evaluate the information received in this manner in various ways. Cookies cannot run programs or infect your computer/mobile device with a virus. Cookies can help to make websites more user-friendly and effective. They can, for example, be used in order to manage advertisements on the Website or to facilitate navigation on a webpage.

#### **What are the different cookie types we use?**

There are different types of cookies with different uses. Some are there just to allow you to browse the website and see certain features. Some give us an idea on your browsing experience, i.e. when you have trouble finding what you are looking for, so we can improve and make your future visit as pleasant as possible.

Cookies set by Rudy Games are called "first party cookies". Cookies set by parties other than us are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third party cookies can recognize your computer or mobile both when it visits the website in question and also when it visits certain other websites. We use first party and third party cookies for several reasons.

The most important cookies are the required cookies. They are essential and help you to navigate on the website and to use basic features. Then there are functionality cookies that enable you to save your cart and to use other additional features like the live chat. Further, we use the performance and analytics cookies to improve our website. Interaction cookies are used for you to interact with social media. Targeting cookies, advertising cookies and social media cookies capture your preferences in order to show you relevant ads outside Rudy Games sites. In addition, social media cookies may be used to track your activity over social media platforms.

#### **Why do we use cookies?**

Rudy Games uses cookies primarily to ensure your visit to our website is as pleasant as possible, as well as for advertising-related purposes during your future visits to other

websites. Below you see a more elaborate overview of the types of cookies we are using and why:

- **Required cookies**

They are essential and help you navigate, move around on the website and see certain features (e.g. these cookies make sure your cart is saved during all the steps of your checkout process). These cookies are required to enable core site functionality. These cookies are stored for the duration of your browsing session.

- **Analytics cookies**

They are there so we can give you an even smoother customer experience. These cookies allow us to analyze site and product usage so we can measure and improve performance. These cookies may be placed by us or a third party on our behalf and are stored for the duration of your browsing session.

- **Advertising and social media cookies**

Remember your product and buying preferences and/or assists Rudy Games marketings activities in other ways. These cookies enable us to share costumer preferences with our advertisement partners, so the advertisement you see can be more relevant for you.

- **Targeting cookies**

Help us to understand shopping behavior of customers. This enables us to keep improving our website, so shopping becomes easier and more pleasant, and to improve the marketing activities.

- **Performance Cookies**

Are used for you to express and share your opinion about Rudy Games. These cookies will enable you to like or recommend Rudy Games on social media and to chat with our service agents.

Services described in 4.) (e.g. Google Analytics, Zendesk, ...) may use cookies to ensure that those tools work correctly.

### **What if you don't like cookies?**

You can change your browser settings to delete or prevent certain cookies from being stored on your computer or mobile device without your explicit consent. The 'help' section in your browser should provide information on how to manage your cookie settings. Find out how this works for your browser here:

- Internet Explorer:  
<https://support.microsoft.com/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox:  
<http://support.mozilla.com/en-US/kb/Cookies>
- Google Chrome:  
<http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>

- Safari:  
<http://support.apple.com/kb/PH5042>
- Opera:  
<http://www.opera.com/browser/tutorials/security/privacy/>

Note that you may visit <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu/> to learn about the options that some of the third parties we work with offer for opting out of certain ad targeting activities. You will need to visit those websites from each browser and device that you would like to be covered by your opt-out. Because the opt-out tools may depend on cookies, you may need to visit these sites again to reinstate your preferences if you delete your cookies.

## 5.2 Social Media Plug-Ins

The Rudy Games Products include social media plugins (e.g. Facebook plugins). Such plugins can recognize a user's IP address and the page visited on the Rudy Games platform and, possibly, store cookies, so that the services offered by Rudy Games work properly. Some Apps may use functions of third parties (e.g. Facebook) through the third party's SDK (Software Development Kit), that may process general device data (e.g. device ID etc.). Social media plugins and widgets are hosted either by third party providers or directly by us. Your interactions with these plugins are subject to this privacy policy or the privacy policy of any third party that offers such feature.

RUDY GAMES IS NOT RESPONSIBLE FOR THE USE OF, OR GUIDELINES REGARDING THE USE OF, PERSONAL DATA BY THIRD PARTY PROVIDERS.

Users may recognize the respective plugins of third parties, e.g., by the respective logo or other respective characteristic typical for the respective social media-platform on our pages.

If a user interacts with the plugins, e. g. by clicking on the Facebook "Like-Button" or entering a comment, while being logged in to such user's Social Media-account, a user links the contents of the Rudy Games pages to his respective social media-profile. Thereby, the social media platforms can associate a user's visit or use of the Products with such user's social media-account. Rudy Games as the provider of the Products does not have any knowledge of the content of the transmitted data or its usage by the social media platforms. Users can find more information on the issue of data transmission in the privacy policy of the respective social media-platform.

If users do not want to have the respective social media-platform associate their visits on our site with their social media-account, users must log out from their social media-account before using Rudy Games Products.

## **6. Why we process data (Purposes)**

### **6.1 Operating the Products**

We process your Data to be able to provide you with a seamless user experience when using our products.

#### **Selling and shipping Products:**

To sell and ship our physical products.

#### **Products and services:**

To operate the Products and services, including to

- authenticate your access to an account
- track your location for location-based content
- personalize our Products and services for you
- log and display activities and interaction statistics

#### **Customer services:**

To investigate, respond to your requests, and resolve complaints and service issues, e.g. to contact you about a question you submitted to our customer service team.

### **6.2 Business Needs**

We process your Data to manage our business needs, but only as long as your rights and interests do not outweigh ours. This includes advertisements and marketing in general.

#### **Performance**

We process Data to monitor, analyze and improve the use of our Products and services. As well as protect the security or integrity of the Products as well as their performance and functionality. For example, we analyze User behavior and perform research about the way you use our Services, Hardware and our other Products.

#### **Research and development**

We process data, including public feedback, to conduct research and development for the further development of our Products in order to provide you and others with a better, more intuitive and personalized experience, and drive membership growth and engagement in our Products.

#### **Marketing in general**

We process Data to market to you by delivering (tailored) marketing materials about Rudy Games Products and online services or the Products and services of Rudy Games.

### **Advertising**

We target and measure the performance of ads to registered users and visitors.

### **Newsletter, Push- and WhatsApp-Messaging Marketing**

With your consent we will send you newsletters with information on (hybrid) game related topics.

### **Retargeting**

You might see marketing messages (ads) on different platforms (e.g. Google, Facebook, ...). In addition, other users who have similar traits to you on those platforms could see marketing messages on those platforms as well (i.e. Facebook Lookalike audience).

## **6.3 Compliance**

We process your data to comply with our obligations and to comply with all applicable laws and regulations.

## **6.4 Enforcement**

We process your data if we think it's necessary for security purposes or to investigate possible fraud or other violations of our terms and conditions or this privacy policy and/or attempts to harm our members or visitors.

# **7. Newsletter, push notifications and WhatsApp messages**

## **7.1 Newsletter**

### **Registration and cancellation**

Rudy Games sends newsletters in the following cases:

- The customer decides to register for the newsletter via the Rudy Games website. In this case the registration is being done with double-opt-in. This requires an e-mail to be sent to the customer after registration to confirm the registration, in order to avoid registration of e-mail addresses that are not valid or confirmed.

- The customer participates in a sweepstake where he entered his personal data (e.g. first name, last name, street, zip, city, country and e-mail address). The customer agrees to the guidelines of the sweepstake and that he receives newsletters and ads from Rudy Games.
- The customer creates a Rudy Games account and at the same time accepts the GDPR and the GTC (General Terms and Conditions) of Rudy Games.

Customers can at any point in time cancel the subscription of the Rudy Games newsletter. By unsubscribing, Rudy Games will not send any additional e-mails through Sendinblue and will not have access to statistical analysis. A separate cancellation of the newsletter and statistical analysis is unfortunately not possible. A link to unsubscribe from Rudy Games newsletters will be at the end of every newsletter

### **Usage of e-mail information system „Sendinblue“**

E-mail newsletters from Rudy Games are being sent by “Sendinblue”, an e-mail distribution platform by the French company Sendinblue SAS, 55 Rue d’Amsterdam, 75008 Paris, France.

The email-addresses of all Rudy Games newsletter subscribers as well as additional data as described in this document will be stored on servers owned by Sendinblue. Sendinblue uses the provided information solely for the distribution and analysis on behalf of Rudy Games. Additionally, Sendinblue can use the information to improve its services, e.g. optimizing their technical infrastructure and setup, visualization of newsletters or for economical reasons to detect the region of where newsletter subscribers come from but not to get directly or over third parties in contact with the subscribers of Rudy Games.

We strongly trust the reliability and the safety of data and the IT infrastructure from Sendinblue.

The privacy policy of Sendinblue can be found here:  
<https://www.sendinblue.com/legal/privacypolicy/>

### **Statistical data analysis**

Newsletters contain a so called “Tracking Pixel” which allows statistical analysis. This “Tracking Pixel” allows to track technical information such as Browser version, IP address and the point in time the document was opened. This information is being used to improve the system and service based on technical data or user groups, by looking how often/how long, where (location guess based on IP-address) and when an e-mail is being read.

Part of the statistical analysis is the detection of whether an e-mail has been read, opened and whether a link was clicked in the e-mail. Technically this information can be correlated to a unique user, but it is neither Rudy Games nor Sendinblue’s intention to track the behavior of individual users. The analysis simply helps Rudy Games understand the reading patterns of its users and to understand whether certain topics in certain e-mails are more or less interesting to our users.

## **7.2 Push notifications and WhatsApp messages**

Rudy Games will also send you push notification and WhatsApp messages through its apps. Notifications and messages will be related to Rudy Games Products (e.g. Energy re-charged, new turn, ...) or information about new features, products or special offers. You can disable push notifications for individual apps in your phone settings or uninstall the app to discontinue receiving push notifications.

## **8. Sharing/Exchange of personal data**

### **8.1 General**

We share/exchange data to third parties only, if this is necessary for the purposes, due to a request from a national authority, due to a court ruling, required by law, necessary to investigate and defend ourselves against any third-party claims or allegations, exercise or protect the rights and safety of Rudy Games, our users, personnel, or others, or if you have consented beforehand. We attempt to notify you about legal demands for your personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

### **8.2 Service providers and other third-party services**

We transfer your data to others, who help us to provide and improve our Products (e.g. maintenance, analysis, audit, payments, fraud detection, marketing and development). Service providers will have access to your data as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes. The list of our service providers/third party service can be found in section 4.

## **9. How long we store data**

### **9.1 Storage period**

We store your data as long as you are a registered user of Rudy Games. Beyond that, we store data, if it is legally necessary (because of warranty, limitation or retention periods) or otherwise required.

## **9.2 Deleting of personal data**

If you decide to delete your account, all personal data we have about you will be deleted with the following exceptions:

- All data for the fulfillment of contractual obligations or the statutory retention requirements by Rudy Games, must not be deleted, but will be minimized to the extend required.
- A request for deleting personal data does not affect on data when retention is required by law, for example, for accounting or billing purposes.

## **10. Your rights**

### **10.1 Exercise of right**

To exercise your rights defined in sections 10.2 to 10.8, please send a request via e-mail to our e-mail address ([hello@rudy-games.com](mailto:hello@rudy-games.com)) or via mail to our postal address (Rudy Games GmbH, Blumauerstraße 35, 4020 Linz, Austria).

### **10.2 Revocation of consent**

You can revoke the consent for future data processing at any time. However, this does not affect the lawfulness of data processing based on the consent before the revocation.

### **10.3 Right of access**

You have the right to obtain (i) confirmation as to whether or not your data is being processed by us and, if so, (ii) more specific information on the data.

### **10.4 Right to rectification**

You have the right to obtain from us the rectification of inaccurate data concerning you. In case the data processed by us is not correct, we will rectify these without undue delay and inform you of this rectification.

### **10.5 Right to deletion**

Should you decide, you do not want us to process your data any further, please contact us via e-mail ([hello@rudy-games.com](mailto:hello@rudy-games.com)). We'll delete your account and your data. Should mandatory provisions of law prevent such deletion, we will inform you.

## **10.6 Right to data portability**

You have the right to receive your data in a structured, commonly used and machine-readable format.

## **10.7 Right to object**

You have the right to object at any time to the processing of data for which our legitimate interests are the legal basis, including profiling based on those provisions.

## **10.8 Right to lodge a complaint**

You have the right to lodge a complaint with a supervisory authority (in Austria: Datenschutzbehörde), if you think that the processing of data infringes applicable law, especially the GDPR.

# **11. Further important information**

## **11.1 Legal bases**

GDPR regulates, that we are only allowed to collect, process and store your personal data, if we have a lawful base. This lawfulness stems from:

- your consent in such cases where you have given consent;
- the necessity for the fulfillment of your user contract
- legitimate interests pursued by Rudy Games or a third party

Legitimate interests include protecting users, Rudy Games or other from security threats or fraud, complying with all applicable laws, managing und improving business (e.g. customer service, reporting) including corporate transactions (e.g. M&A), enabling users to share images, data or other information of the user at the request pf the user with other users or the public.

## **11.2 Safety measures**

To avoid unauthorized access to data and generally secure the data of Rudy Games, we apply the safety measures which comply with the latest technological developments.

## **11.3 Images**

By uploading pictures, you confirm that other persons depicted in the pictures consent to the upload of the respective picture

#### **11.4 Usage of minors**

Users under the age of 18 are not allowed to transmit any personal data to Rudy Games, without the consent of their legal guardian. Transmit personal data to Rudy Games from minors is only allowed if the explicit permission of their legal guardian is given.

### **12. Changes to the privacy policy**

#### **12.1 General**

Rudy Games remains the right to change this privacy policy at any time.

#### **12.2 Material changes**

If we make material changes to our privacy policy, we will provide notice directly in our Products, apps, on our website and/or via e-mail, to provide you the opportunity to review the changes before they become effective. Material changes are, for example, including further tracking, profiling and analytics services. Should your agreement be necessary, we will obtain it, before the changes become effective. If you object to any changes, you may close your account and delete all your personal data.

#### **12.3 Last update:**

This privacy policy was last modified on September 09, 2019.

### **A. Imprint**

Rudy Games GmbH  
Blumauerstraße 35  
4020 Linz  
Austria

Authority according to

E-Commerce Act:	District Authority of Linz (City)
Chamber:	Upper Austria Economic Chamber
Registered office:	Linz
Legal form:	Limited liability company
Chief Executive Officer:	Ing. Manfred Lamplmair, MA, MBA
Jurisdiction:	Linz Regional Court
Company register number:	FN399509p
Sales tax ID number:	ATU 68102518