

PRIVACY POLICY

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Adept Marketing Ltd (registered number 516358074 (“us”, “our”, “we”, “Adept”) is the controller of personal data collected through <http://www.adept.tech>] (the “Website”) and a processor of personal data on behalf of games developers, publishers and other rights owners. Adept is committed to protecting and respecting privacy.

This privacy policy (the “Policy” or “Privacy Policy”) sets out the types of personal data we collect and use when users access and visit the Website (including prospective customers and mere browsers of the Website) and when our customers share personal data with us. The Policy sets out how we may use that data.

1. Introduction

This Privacy Policy explains who we are, why and how we process personal data collected through use of the Website and, if you are the subject of any of the personal data concerned, what rights you have and how to get in touch with us if you need to.

When you supply any personal data to us, we have legal obligations towards you in the way we use that data. This is also true for personal data that is passed to us for processing under agreements with our customers. For ease of reading, we have divided this Policy into several sections:

1. Introduction
2. What information can we collect
3. Special Category Data
4. How is your personal information collected
5. How and why do we use and share your personal information
6. For how long do we keep your personal information
7. Security
8. International Data Transfers
9. Your Rights
10. Contact Details

It is important that you read this Policy together with any other privacy notice or fair processing notices that we may provide on the Website at or around the time that we collect or process personal data about you (for example, fair processing notices that we may display to you at the time that you log onto the Website) so that you are fully aware of how and why we are using that data.

This Policy supplements other notices on the Website and is not intended to override or replace them.

By using the Website, you agree to its terms (including as amended from time to time) and this Privacy Policy. If, for any reason, you do not agree to the terms of this Policy, please stop using this Website.

We reserve the right to revise or amend this Policy at any time to reflect changes to our business or changes in the law. Where these changes are significant, we will endeavour to let users of the Website know. However, it is your responsibility to check this Policy before each use of the Website – for ease of reference the top of this Policy indicates the date on which it was last updated.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Please note that the Website is not expected to be used by children under the age of 18 (each a "Child" or "Children.")

However, we do process personal data about Children on behalf of our customers. We perform such processing and rely on performance of a contract as the lawful basis for processing Children's data. We have contractual clauses in place with our customers to ensure that their processing of personal data is lawful and that special attention is given to the processing of Children's personal data.

2. What information can we collect?

What is personal data?

Where this Policy refers to 'personal data' it is referring to data about you from which you could be identified – such as your username, your contact details and even your IP address. When processing personal data on behalf of customers, we process broader categories of personal data, as explained below.

What types of data we collect from you when you use the Website

The personal data we collect from you may include:

- Identity Data which includes your name and username .
- Contact Data which includes your e-mail address
- Transaction Data which includes details about your interactions with the Website, including a history of actions taken
- Technical Data which includes your IP address, your login data and browser type and

version.

- Usage Data which includes information about how you use the Website.
- The company that employs you, and your job title

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What type of data we process on behalf of our customers

- Identity Data which includes your name and username, Apple's ID for Advertising (IDFA), Google Android ID and Advertising ID for Android (AIFA), carrier user "ID," geo-location information and social media identifiers.
- Transaction Data which includes details about your interactions with games, including a history of actions taken
- Technical Data which includes your IP address, your browser type and version.
- Usage Data which includes information about how you play games such as frequency of play, play time, game personalisation, purchasing habits
- Marketing and Communications Data which includes your preferences in receiving marketing from games providers and publishers, responses to promotions and responses to advertisements.
- Publisher and marketing data from the marketing platforms connected to Adept

3. Special Category Data

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data. Nor do we collect any information about criminal convictions and offences.

4. How is your personal information collected?

Direct interactions

When you use the Website to register as a member, complete a form, contact us by email browse from page to page, we may collect, store and use the personal data that you disclose to us.

Automated technologies or interactions

We shall also collect information about you when you visit and interact with the Website through the use of technologies such as cookies. The following are examples of information we may collect:

- information about your device, browser or operating system;
- your IP address;
- information about links that you click and pages you view on the Website;
- page response times;

We use the data described above for several different reasons. First we use it to ensure that the Website works properly and that you are able to receive the full benefit of it. Secondly, we use the data to understand and refine the functionality of the Website. Thirdly, we use the data

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to gain insights about user preferences and interests. We undertake these activities because we have a legitimate interest in doing so.

Our Customers

Our customers appoint us to process your personal data for them, so they can improve the marketing investments. We undertake these activities to fulfil a contract with the customers and they will advise you of their lawful basis for collecting and sharing your personal data with us.

Our customers provide us your personal data through a technological interface called an

“API.” Updating your information if you use the Website

If you want to update the information you have previously given to us, you can use the interactive services available on the Website.

5. How and why do we use/share your personal data?

Lawful basis for processing your information

We will only use your personal data when the law allows us to. Most commonly we will use your personal data in the following circumstances:

- Where you have asked us to do so, or consented to us doing so (although consent is not necessarily required for us to process your personal data);
- Where we need to do so in order to perform a contract we have entered into with you or a third party;
- Where it is necessary for our legitimate interests (or those of a third party) and your fundamental rights do not override those interests; and
- Where we need to comply with a legal or regulatory obligation.

Here are some examples about how we may use the information we collect about you and the lawful basis we rely on to do so.

Activity	Examples of the types of personal data we may collect	Lawful basis for processing
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To register you as a user of the Website	Identity, contact and transaction information	Performance of a contract with you.
To manage our relationship with you including notifying you of any changes to the	Identity, contact, profile and marketing communications information.	Performance of a contract with you.

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Website or services provided on the Website.		
To administer, protect and maintain our business and this Website (including troubleshooting, data analysis and system testing.)	Identity, contact, transaction and technical information.	Legitimate interests and/or performance of a contract with you.
On behalf of our customers, to use data analytics to improve the games, functions, content, marketing, customer relationships and experiences for their users	Identity, profile, transactional, technical and usage information.	Legitimate interests
On behalf of our customers to enable them to deliver relevant content, promotions and advertisements to you.	Identity, contact, profile, usage, marketing and communications, technical and technical information.	Legitimate interests

Communications with users of the Website

We may use your personal data to contact you with news and updates that may be of interest to you.

You will receive marketing communications from us if you are a user of the Website and you have not opted out of receiving that marketing.

Sharing your personal data

By virtue of our contract with our customers, we share personal data back and forth with the customers.

We may also disclose your personal data to third parties in the following events:

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- if we were to sell or buy any business or assets, in which case we might disclose your personal data to the prospective seller or buyer of such business or assets as part of that transaction;
- if Adept Marketing Limited or substantially all of its assets are acquired by a third party, in which case personal data held by us about our customers and contacts will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or if we are asked to provide your details to a lawful authority in order to aid in the investigation of crime or disorder; and/or
- in order to enforce or apply the Website's terms of use.

Service Providers (Data Processors)

Our service providers provide us with a variety of administrative, statistical, and technical services. We will only provide service providers with the minimum amount of personal data they need to fulfil the services we request, and we stipulate that they protect this data and do not use it for any other purpose. We take these relationships seriously and oblige all of our data processors to sign contracts with us that clearly set out their commitment to respecting individual rights, and their commitments to assisting us to help you exercise your rights as a data subject. We do not allow our third-party service providers to use your personal data for their own purposes.

Cookies

Cookies are text files, comprised of small amount of data, that are saved on your computer or other device (e.g. smartphone, tablet, etc.) when you use the internet and visit various websites.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or not function properly.

We use cookies for a number of purposes including cookies that are strictly necessary for the

functioning of the Website. The Website cannot operate properly without these cookies and for analytics that help us understand how you and other users interact with our Website by collecting data that does not directly identify you.

Change of purpose

Website Users: We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Other personal data: We process this personal data under the terms of a contract with the games publisher. Please refer to their privacy policy in order to understand what purposes they are using personal data for.

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6. For how long do we keep your personal data?

We will hold your personal information on our systems only for as long as required to provide you with the services you have requested, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation with respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we may anonymise personal data (so that it can no longer be associated with a private individual) for our commercial purposes in which case we may use this information indefinitely without further notice to you.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate usage data to calculate generalised data about the games industry.

7. Security

Adept takes the protection of personal information seriously. We have put in place technologically and organisationally appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Where you use a password to enable access to the Website, you are responsible for

keeping this password confidential. We ask you not to share a password with anyone.

In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. International Data Transfers

Please note that some of our service providers may be based outside of the Israel. These service providers may work for us or for one of our suppliers and may be engaged in, among other things, the fulfilment of your request for information and the provision of services or support services.

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Where we transfer your data to a service provider that is outside of Israel, we seek to ensure that appropriate safeguards are in place to make sure that personal data is held securely and that data subject rights are upheld. Where we use certain service providers, we may use specific contracts approved for use in Israel which give personal data the same protection it has in Israel.

9. Your Rights

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance concerns@adept.tech.

As a data subject you have a number of rights in relation to your personal data. Please see this link for further details: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Contact Details

If you have any queries regarding this Privacy Policy, if you wish to exercise any of your rights set out above or if you think that the Privacy Policy has not been followed, please contact us by emailing at privacy@adept.tech

You may also lodge a complaint to the supervisory authority about the way we process your personal data. We would however, appreciate the chance to address your concerns before you approach the supervisory authority, so please contact us in the first instance.

