

Data controller, or who will be responsible for processing your data?

The data controller, i.e. the entity which determines and controls how your personal data will be used, is 11 bit studios S.A. (the "Company") with its registered office at ul. Brzeska 2, 03-737 Warsaw, Poland. The Company can be contacted at the postal address given above or via email at: iod@11bitstudios.com

Data Protection Inspector

The Company has appointed a Personal Data Protection Inspector, who can be contacted at the address indicated above.

Purpose of processing, or what will the Company process your data for?

Note that the Company may process the same data (e.g. your first name and surname) for various purposes. The Company will process your personal data for the following purposes:

- Processing and contacting you with regard to your application to perform tests,
- Processing your request to to give you access to the playtest build on MS Store

Basis for processing, or on what grounds is the Company authorised to process your personal data?

The Company may process your personal data as this is necessary for the execution and proper performance of your inquiry to be part of game tests.

Are you required to provide your personal data to the Company?

Provision of your personal data is a precondition for the execution of your inquiry regarding your request to be included in game tests. If you do not provide the personal data required, it may be impossible to contact you or proceed with your inquiry.

Otherwise, the provision of your personal data is voluntary.

What rights do you have towards the Company in respect of data processed?

With regard to the processing of your personal data by the Company, you have the right to request from the Company:

- access to your data;
- rectification of data: in the case of incorrect or incomplete data;
- erasure of data: if such data is no longer necessary in relation to the purposes for which it was collected by the Company; if you withdraw consent to the processing of such data (in the case of processing based on consent); if you object prior to the processing of such data; if your data has been unlawfully processed; if your data has to be erased for compliance with a legal obligation;
- restriction of data processing;
- data portability.

If personal data is processed based on your explicit consent, you have the right to withdraw such consent at any time.

You have the right to lodge a **complaint** in respect of processing of your personal data by the Company with the President of the Polish Personal Data Protection Office (at the following address: *Biuro Prezesa Urzędu Ochrony Danych Osobowych*, ul. Stawki 2, 00-193 Warszawa, Poland).

When do you have the right to object to data processing?

You have the right to **object** to the processing of your personal data if the processing is based on legitimate interests and/or is carried out for statistical purposes, but such objection is nevertheless justified by your particular situation.

Who may the Company share your personal data with?

The Company may make your personal data available to:

- competent state authorities for the purpose of relevant account-giving if this is necessary for the exercise or defence of legal claims, or otherwise if the Company is required to do so under the provisions of law, to the extent directly arising under such provisions;
- vendors of software used by the Company (including providers of mail and web messaging services, etc.);
- independent auditors engaged by the Company (data processing for audit purposes);

For how long will the Company retain your personal data?

Generally, your personal data will be retained for the duration of your consent.

To some extent, legal regulations may require us to retain data for a specific period of time. Therefore, for example, your data:

- included in documents necessary to support tax accounting will be retained for five years from the end of the year in which a relevant tax event occurred;
- with regard to your requirement to be included in the game credit for the duration of the exploitation of the game.

The Company may also retain data for account-giving purposes to demonstrate compliance with its statutory obligations – in principle, indefinitely.

All data processed in respect of your consent may be retained at least for the duration of the statute of limitation applicable to claims that may arise in connection with Company sending information, if the Company has reasonable grounds to believe that it may need to exercise or defend legal claims, or for the duration of judicial proceedings including the judgment enforcement period.

Will your personal data be transferred to third countries?

Personal data may be transferred to countries outside the European Economic Area if it proves necessary to the extent necessary for the legitimate interests pursued by the Company (e.g. in the event of the need to preserve the identity of the Company and its team in a country outside the European Economic Area). In this case, the transfer of personal data is based on a decision of the European Commission stating the adequate level of personal data protection in a third country or using appropriate legal safeguards, which in particular include standard contractual clauses approved by the European Commission. In the absence of a decision of the European Commission confirming the adequate level of personal data protection in a third country or in the absence of appropriate legal safeguards, such as standard contractual clauses, your personal data may be transferred to a third country on the basis of one of the grounds listed in Art. 49 section 1 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (GDPR), including in particular based on your express consent.

Will automated decisions be made based on your data?

Personal data will not be used for automated decision-making, including profiling understood as automatic processing of data.