

## Thingo Privacy Policy

This is the Privacy Policy of Thingo, Leidsevaart 594, 2014 HT, Haarlem, The Netherlands (hereinafter referred to as THINGO). It applies to all Web-sites and games operated by THINGO.

THINGO shall handle all personal data which the user submits during his contractual relations strictly confidential and shall adhere to all relevant data protection regulations. Details can be taken from this Privacy Policy.

The Websites and games operated by THINGO may provide links to websites owned or operated by third parties or otherwise direct the user to websites owned or operated by third parties (each, a "Linked Website"). The use of any Linked Website will be governed by terms of use, privacy policies and other additional terms, notices and policies set forth or referenced in any such Linked Website. To understand how a Linked Website and the owners or operators of a Linked Website will collect, use, store and otherwise make available a user's Personal Information, the user should review the Linked Website's privacy policy; none of these activities is governed by this privacy policy, and THINGO shall not be responsible for the use of any Personal Information by or through any Linked Website.

### **Which personal data is collected, used and stored by THINGO?**

THINGO collects, uses and stores such personal data which the user voluntarily submits to THINGO by electronic or other means of communication (e.g. in standard forms or otherwise on the Websites and games operated by THINGO).

This includes data which the user states vis-à-vis other users when communicating with them in the Websites and games operated by THINGO.

In order to register for the use of the games operated by THINGO, the user has to provide THINGO with certain personal information, sometimes including the user's Email address and/or Facebook account ID.

The user is recommended to handle his data carefully and sparingly and to consider thoroughly what and with whom he would like to communicate in the Websites and games operated by THINGO. Certain information, e.g. communication between users, is visible for other users of the Websites and games operated by THINGO.

Here are some examples for data stored by THINGO:

When a user accesses or uses the Websites and games operated by THINGO, THINGO automatically collects and stores the following types of non-personally identifiable information (information that is compiled in anonymous and aggregate form and is not used to locate, contact, or identify you specifically) in addition to the Personal Information the user provides voluntarily: information from server logs found on the browser, information regarding the volume and status of data transmission, click-through statistics, IP address, the type of application (e.g. web browser) used to access the Websites and the games operated by THINGO, the type of operating system used, the name of the domain and host from which the user accesses the Internet, the date and time the user accesses

portions of the Websites and games operated by THINGO, and the Internet address of the site from which the user linked directly to the Websites and games operated by THINGO.

THINGO stores the Email address provided by the user. THINGO shall be entitled to use this Email address to inform the user of innovations and newsletters. The user can object to this at any time and request deletion of his data from the mailing list in written form (e.g. via Email). The user will not be charged for such request, but he will have to pay for the costs of transmitting such request (at basic tariffs). The user will be informed about his right to object and he will be given the right to transmit his objection in each information and in each newsletter sent by THINGO.

#### **What does THINGO do with user data?**

THINGO will use the information automatically collected through the user's access and use of the Websites and games operated by THINGO to help determine how the Websites and games are utilized and to help improve the Websites and games. For example, the information will allow: (i) to determine which pages are the most popular with users, (ii) to determine if the Websites and games are working properly or if the Websites and games are being used improperly, and (iii) to improve the user experience on the Website.

THINGO will collect and store protocols which reflect how the Websites and games operated by THINGO are used, e.g. in-game user activity, in-game communication between users or communication within game related services. These protocols include the monitoring of gaming patterns and inspections regarding possible manipulations of the games operated by THINGO. Therefore, these protocols can be used to detect and disclose improper and unduly user activity. THINGO uses specific programs in order to detect infringements of the rules of the games, e.g. programs which can detect the use of unauthorized scripts and which can store the IP-addresses as well as further data which the browser transfers as header information. In case that THINGO notices that a user acts in breach of his contractual obligations, e.g. by using unauthorized scripts, THINGO expressly reserves its rights to merge the IP-address of the respective user with other data which is already stored regarding that user, in order to make the user aware of his breach of contractual obligations. THINGO may institute further measures against the respective user in order to restore regular gaming services.

For purposes of handling of payments, THINGO shall be entitled to transfer user data to external service providers assigned with the collection of the remuneration, in as far as this is necessary for the determination of the remuneration and settlement of accounts with the user. THINGO shall further be entitled to transfer user data to such third parties to whom THINGO has assigned its claims against the user, in as far as this is necessary for the collection of the assigned claims. THINGO shall inform the user of the names of such third parties. If THINGO cooperates with third parties in order to render its services, it shall commit such third party to adhere to the effective data protection regulations and to provide for adequate data protection.

THINGO may aggregate and use certain non-personally identifiable information for research, advertising or marketing purposes and may share, sell and rent or trade that information and statistical data derived from that information with advertisers, vendors, customers or other third parties for research or marketing purposes. The aforementioned utilization of data is carried out anonymously and THINGO does not use automatically collected information to identify a particular

user. THINGO informs the user that such information is not Personal Information and is therefore not subject to the privacy restrictions of this Privacy Policy. If and as far as THINGO uses personal data to create user profiles, THINGO shall not transfer such profiles without the prior consent of the user and shall immediately stop such utilization of user profiles if the user objects to such use of his data.

THINGO may possibly enable third parties to contact the user for advertising purposes. As long as the user does not object, his user data may also be used for sending him advertisements which reflect his interests (based on the information he has submitted to THINGO and on his actions within the games and Websites operated by THINGO).

### **Changes to or Deletion of Personal Data**

The user may make changes to his personal data at any time (e.g. in order to update or correct such data) or delete his personal data completely. If the user would like THINGO to change his personal data or stop using his data, the user may contact THINGO at [privacy@thingo.nl](mailto:privacy@thingo.nl). THINGO will then provide information how to delete user data, make the required changes or delete the user data as quickly as possible. THINGO points out that due to technical or organizational reasons some measures may still be carried out after the user has submitted his request for deletion, if such measures were already initiated but not accomplished by that time.

### **Information as to personal data**

The user shall be entitled to request free of charge information on the content and extent of his stored personal data through a corresponding written notice to THINGO. This information will usually be provided electronically, normally via Email.

THINGO may change this Privacy Policy from time to time by posting updated versions of the Privacy Policy. THINGO suggests to review this Privacy Policy from time to time. Personal Information which THINGO collects will be treated in accordance with the terms of the Privacy Policy in effect (as posted) at the time that the Personal Information is collected. THINGO will inform the user in case that THINGO intends to extend the use of personal data.

### **Glossary**

In order to provide for a better understanding of this Privacy Policy, the most important terms are explained hereinafter:

#### **What is considered personal data?**

Personal data means personally identifiable and recognizable information about an individual person, as defined under applicable privacy laws, and may include his or her name, physical address, email address and telephone number.

#### **What is considered user data?**

User data means data which is collected, used and stored by THINGO when a user contacts the Websites and games operated by THINGO. User data is information which can be used to identify the user (e.g. the name of the domain and/or IP-address from which the user contacts THINGO), the date and time the user accesses the Web-sites and games operated by THINGO, the scope of use of the

Websites and games operated by THINGO, as well as information about the sites the user accessed on the Websites and games operated by THINGO.

### **What is an IP-address?**

IP-addresses serve to identify each computer which is connected to the Internet. Each computer which is connected to the Internet can be allocated to a specific IP-address, i.e. to a certain numerical combination.

### **What are Cookies?**

“Cookies” are small text files that a website sends to a user’s hard drive through the browser. THINGO uses Cookies to collect information about a user’s visits and to enhance the user’s experience when visiting the Websites and games operated by THINGO.

For example, THINGO uses Cookies to, among other things, identify previous visitors to the Website, identify a user as he or she moves through the Website, track user visits and account set-ups, determine what set-ups are most frequently re-requested, and save the user password so that the user does not have to provide it each time he or she visits the Website. Storing information about visits to the Website will allow THINGO to, on occasion, customize pages for the user.

By themselves, Cookies do not reveal a user’s Email address or other Personal Information. THINGO does not use Cookies to collect, track, or store Personal Information. The THINGO Cookies will never be used to track a user’s activity on any third-party websites or to send spam. It is possible to configure the browser to accept all Cookies, reject all Cookies or notify the user when a Cookie is received. It is also possible to reject, delete or otherwise disable Cookies at any time. Doing so, however, may inhibit the user experience on the Websites and games operated by THINGO and the user may not be able to take full advantage of all offerings on the Websites and games operated by THINGO.

For example, if the user disables or disallows Cookies, some multimedia images and graphics may not display properly, the user may not be able to view customizable features or the user may have more difficulty navigating through the Website.

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