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TSG STORE PRIVACY POLICY

Dear User, we are glad that you have decided to use TSG Store.

This is our privacy policy (“**Privacy Policy**”) which describes how we process your personal data, who we provide it to, and how long we retain it. Read it to learn what rights you have and how you can exercise them.

This Privacy Policy applies to the services and features (“**Services**”) you may access, purchase, or use as part of the TSG Store platform provided by Ten Square Games with its registered office in Wrocław, Poland (“**Platform**”). Any natural person visiting the Platform or using one or several Services or functionalities described in the Policy is considered a Platform or Service User.

Please read the Privacy Policy and the accompanying TSG Store Terms of Use.

I. CONTROLLER

The Controller of your personal data is Ten Square Games S.A. with its registered office at ul. Traugutta 45, 50-416 Wrocław, Poland.

II. CONTACT US

Contact us, and we will make every effort to give you a satisfactory answer. There are three ways to do this:

- ❖ through the communication channels available on our home page: www.tensquaregames.com – the “Contact” section, or in our Services via the User account – the “Help” section;
- ❖ by regular mail to: Ten Square Games S.A., ul. Traugutta 45, 50-416 Wrocław, Poland;
- ❖ via e-mail: administracja@tensquaregames.com.

III. DATA PROTECTION OFFICER

Ten Square Games has appointed a data protection officer. You may contact the data protection officer if you want to erase your data or exercise any other rights you may have under data protection laws, including the GDPR, or ask any questions you may have about personal data processing.

Data Protection Officer
Ten Square Games S.A.
Traugutta 45, 50-416 Wrocław, Poland
dpo@tensquaregames.com

IV. WHAT ARE THE PURPOSE AND LEGAL GROUNDS FOR OUR PROCESSING OF YOUR PERSONAL DATA?

The primary purpose for which we process your personal data is to perform the agreement you have concluded with Ten Square Games by accepting the TSG Store Terms of Use. We need your data to, among other things, support your account on the Platform and deliver the ordered product to you. The legal grounds for the processing of your personal data in this case are that the processing is required for agreement performance (Article 6(1)(b) of the GDPR).

Your personal data may also be processed for the following purposes:

- ❖ to comply with the legal requirements linked, for example, to payments for the content bought from TSG Store – the legal grounds in this case are that the processing is required to comply with a legal requirement binding upon Ten Square Games (Article 6(1)(c) of the GDPR);
- ❖ to process your purchase made on the Platform – the legal grounds are that the processing is required for agreement performance (Article 6(1)(b) of the GDPR);
- ❖ to review and handle complaints – the legal grounds are that the processing is required for agreement performance (Article 6(1)(b) of the GDPR);



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- ❖ if relevant consent is granted – to engage in marketing activities such as presenting products and services and communicating marketing content – the legal grounds for the processing in this case are the legitimate interest involving the promotion of Ten Square Games in connection with the granted consent to receive marketing communications (Article 6(1)(f) of the GDPR);
- ❖ for analytical and statistical purposes, which include developing and improving the Services and the offering – the legal grounds for the processing in this case are the legitimate interest which involves adaptation of the development of services and content offered by Ten Square Games (Article 6(1)(f) of the GDPR);
- ❖ for technical, administrative purposes – to ensure the security and management of the IT system – the legal grounds for the processing are the legitimate interest of the Controller which involves delivering and improving the functionalities offered to Users (Article 6(1)(f) of the GDPR);
- ❖ to establish, assert, and defend claims – the legal grounds in this case are the legitimate interest which involves providing effective legal protection to Ten Square Games (Article 6(1)(f) of the GDPR).

V. HOW LONG DO WE RETAIN YOUR DATA FOR?

The retention period of your personal data depends on the purpose for which we have obtained it. First and foremost, we retain your personal data for as long as this remains necessary to provide our Services to you.

We can also retain your personal data until our legitimate interest in the processing expires or until you effectively object. The retention period lasts until a moment defined in the applicable laws.

The retention period of your personal data may also be extended where necessary for the protection of our rights, and thereafter – only if and insofar as required by the applicable laws.

You may delete your account in a game at any time. In such a case, we will erase your personal data, except for the personal data which we are required to retain under the applicable laws or based on our legitimate interest involving the establishment, assertion, or defense of claims.

VI. WHO DO WE DISCLOSE YOUR PERSONAL DATA TO?

Ten Square Games uses services of its partners. The partners process your personal data exclusively at the request and in accordance with the instructions provided by Ten Square Games for the purpose of Service provision. Our partners are third-party IT service providers (including providers of IT systems), entities supporting us in correspondence management, operators of online payment platforms, and sales partners.

VII. PERSONAL DATA TRANSFERS TO NON-EEA COUNTRIES

Due to the global nature of our Services and in order to guarantee the best possible user experience, we may send your personal data to various countries, including countries outside the European Economic Area (“EEA”). Since some countries may have different data protection legislation than your country, we take the steps to provide appropriate safeguards to protect the data you provide to us.

Appropriate safeguards include in particular:

- 1) decisions of the European Commission declaring an adequate level of personal data protection in a given country,
- 2) standard contractual clauses approved by the European Commission.

Where necessary, in order to improve personal data security, we apply additional supplementary safeguards, such as for example encryption, to guarantee secure transfer of personal data to a non-EEA country.

Please be informed that you have the right to receive the copies of the safeguards we apply, in the form of an appropriate document, at any time. To this end, please contact: dpo@tensquaregames.com.

VIII. INDIRECT COLLECTION OF YOUR DATA

We collect your shopping data. If you make any payment, our payment processing partners collect settlement and payment information required to process your payment and complete the purchasing process. This data may include information about your transaction, your first and last name, the items you bought, transaction ID and transaction details.



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IX. YOUR RIGHTS

You have the right to:

- 1) request access to your personal data (Article 15 of the GDPR);
- 2) request rectification of your personal data (Article 16 of the GDPR);
- 3) request erasure of your personal data (Article 17 of the GDPR);
- 4) request restriction of processing of your personal data (Article 18 of the GDPR);
- 5) request personal data portability (Article 20 of the GDPR) – where your personal data is processed under a contract concluded with us;
- 6) object to the processing of your personal data in connection with your particular situation (Article 21 of the GDPR) insofar as your data is processed based on legitimate interest of Ten Square Games; where your data is processed on this basis for marketing purposes, you may object without justifying your objection.

If we process your data based on your consent, you have the right to withdraw that consent at any time, which shall not affect the lawfulness of any processing done before the withdrawal.

The exercise of some rights may be restricted by the applicable laws or the legitimate interest of the Controller.

If you decide that your rights or personal data processing rules have been breached, you have the right to lodge a complaint with a supervisory authority. In Poland, the default authority for such complaints is the President of the Personal Data Protection Office (Urząd Ochrony Danych Osobowych, address: ul. Stawki 2, 00-193 Warszawa, Poland; <https://uodo.gov.pl/en>); however, you can also complain to any other data protection authority in a European Union member state.

Please submit any personal data requests to: dpo@tensquaregames.com.

X. REQUIREMENT TO PROVIDE PERSONAL DATA

You giving us your personal data is the prerequisite for the conclusion of a Service contract. You may of course refuse to give us your data; however, you will then be unable to use our Services. You may be required to give other personal data, for example for the purpose of the payment process – failure to give the data will make it impossible for you to complete the purchase; failure to give your data in the complaint process will make it impossible to review your complaint.

Providing us with your data for our marketing purposes is optional.

XI. AGE RESTRICTIONS

Our Services are not intended for people under the age of 18. If you are under 18, please do not provide any personal data to us. We neither consciously collect nor consciously solicit personal data of individuals who are under 18. Furthermore, we neither consciously address marketing content to such individuals nor consciously allow individuals under 18 to use our Services. No one under the age of 18 may provide any personal data. If we become aware that we have collected personal data of someone under 18, we will delete such data as soon as possible. If you suspect that we may be in possession of any data provided to us by or concerning a child under the age of 18, please contact us.

XII. REVISIONS

We may revise this Privacy Policy by posting a new version on the Platform. If we make any major changes, we will inform you about this by posting a notice in the Service before the revision is effective. Your continued use of the Service after the date in which the revision came into force will be subject to the revised Privacy Policy.

Last revised: October 6, 2023