

Here at eRepublik Labs we care about your privacy and we respect your privacy rights.

By using the eRepublik Service (as defined below), you permit the collection and use of your personal information as outlined below and you signify your agreement to this Privacy Policy. If you do not agree with these terms, you should not use Service.

1. About our Privacy Policy

eRepublik Labs Ltd of The Palmerston House 2nd Floor, Denzille Lane Dublin 2, D02 WD37, Ireland registration no. 462101, VAT No. IE - 9693023K ("eRepublik Labs", "we", "us" and "our") provides and operates the website www.erepubliklabs.com, all the webpages containing that address and any webpage containing this domain name, including any page that is enabled for use by a mobile device ("**Website**") as well as in any other areas of the Website not listed here, that we will or may be created in the future ("eRepublik Service").

1.2 This policy (together with our Terms and Conditions of Use https://www.erepubliklabs.com/files/uploads/Terms_and_Conditions_of_Use.pdf and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

2. How we Collect Information

2.1 We only collect and use personal information of our users insofar as this is necessary to provide the eRepublik Service. We collect and process personal information only with the user's consent or in those cases in which the collection and processing of the personal information is permitted by law. When registering as a user of the eRepublik Service or during your time as a user of the eRepublik Service you will be asked to provide information to us. We will inform you at the time of collecting other information from you whether you must provide the information to use the eRepublik Service or whether the provision of information requested by us is optional. We will inform you at the time of collecting information from you whether the information that you provide to us will be accessible to other users of eRepublik Service or by third parties so that you can decide whether to provide the information to us.

2.2 We may also collect and process the following personal data about you:

- Information about the browser type and version used
- The user's operating system
- The Internet service provider of the user
- The IP address of the user
- Date and time of access
- Websites from which the user's system reaches your website
- Websites accessed by the user's system via your website

2.2.1 if you contact us (including by email or post) we may keep a record of that correspondence and of the information contained in it;

2.2.2 information that you submit through the apply now form in the Careers section or through any other contact form on the Website;

2.2.3 details of your visits to eRepublik Service including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access.

2.3 Persons under 16 years of age are not entitled to use the Website. If you are between 16 and 18 years of age you agree that you have made sure that you have brought this Privacy Policy to the attention of a parent or guardian and that they have consented to you agreeing to this Privacy Policy and using the eRepublik Service (provided that the giving of such consent is not prohibited by law).

3. Uses made of the information

3.1 We use information held about you in the following ways:

3.1.1 to ensure that content from eRepublik Service is presented in the most effective manner for you and for your computer; such as hosting and displaying information, providing updates, developing, improving or expanding the eRepublik

Service and addressing technical issues; The legal basis for the processing of personal information is Art. 6 para. 1 lit. b GDPR.

3.1.2 to provide you with information, products or services that you request from us. The legal basis for the processing of personal information is Art. 6 para. 1 lit. b GDPR.

3.1.3 to provide you with information which we believe may interest you (including products or services of any of our Partners) in case you have consented to be contacted for such purposes including by interacting with advertising functionality in eRepublik Service. The legal basis for the processing of personal information is Art. 6 para. 1 lit. a GDPR. For our mobile games we use advertising platforms that provide incentivized advertising (e.g. the user gets a reward by watching an ad). The legal basis for the processing of personal information is Art. 6 para. 1 lit. f GDPR. It is in our interest to provide advertising in our games and to give the user an opportunity to receive rewards in the game.

3.1.4 in order to process your application to one our job offers or for an internship or even if you just decide to send it to us in order to be considered for future job openings.

3.1.5 to deliver and maintain a high quality service; to provide customer support or to resolve customer issues; The legal basis for the processing of personal information is Art. 6 para. 1 lit. b GDPR.

3.1.6 to allow you to access the eRepublik Service and to participate in interactive features of our service, when you choose to do so; The legal basis for the processing of personal information is Art. 6 para. 1 lit. b GDPR.

3.1.7 to notify you about changes to our service, new features or new versions of the eRepublik game, about new games or applications developed by our company or by our Partners; The legal basis for the processing of personal information is Art. 6 para. 1 lit. b GDPR and Art. 6 para. 1 lit. f GDPR. We have an interest in providing you with marketing information about our products and those of our partners.

3.1.8 for the purposes of compiling statistics and to generate and analyze information about our users so we can better understand them and how they use the eRepublik Service and draw trends and predictions based on this information; The legal basis for the processing of personal information is Art. 6 para. 1 lit. f GDPR. Our interest is in improving our services.

3.1.9 to process payments. The legal basis for the processing of personal information is Art. 6 para. 1 lit. b GDPR.

3.1.10 if you signed up for any newsletter, to contact you by email for news, promotional purposes or market research and that you may opt-out of by clicking an opt-out link located in such an email. The legal basis for the processing of personal information, in the case of existing consent, Art. 6 para. 1 lit. a GDPR.

The personal information will be deleted as soon as it is no longer necessary to achieve the purpose for which it was collected. The user's email address will therefore be stored for as long as the subscription to the newsletter is active. The user may cancel the subscription to the newsletter at any time by clicking on the unsubscribe link at the end of each email newsletter.

4. Disclosure of your information to other people

4.1 We do not disclose to any third party personal information that you provide to us unless we have your permission or the law permits or requires it.

4.2 If you provide personal information to us you understand and agree that we may disclose your personal information to the following third parties:

4.2.1 to the eRepublik Labs hosting provider: Amazon Inc. which uses servers located in the EU and in the US.

You acknowledge that we may change the hosting provider at any time and any such change will be posted on eRepublik Service by an amendment to this Privacy Policy. You consent to the transfer of your personal data to any new hosting provider's servers. You may communicate any questions, comments or requests in relation to any change in hosting provider by emailing privacy@erepubliklabs.com or via the Contact section of our website.

4.2.2 if you have indicated at registration, or at any time during your time as a user of eRepublik Service that you are happy to receive information or promotions from selected third parties about goods and services which may be of interest to you,

you consent to us sending you such offers or information. You may opt out of receiving such offers or change your preferences at any time by emailing privacy@erepubliklabs.com;

4.2.3 to companies that provide emailing services, with the sole purpose of sending you information about our services, including about any updates, new features or new versions of the eRepublik Service. These companies are prohibited from using your personally identifiable information for any other purpose than as mentioned in this article. You may opt out of receiving such offers or change your preferences at any time by emailing privacy@erepubliklabs.com;

4.2.4 any third party user of the eAPI System who or which you have authorised in the manner described in paragraph 3.4 above;

4.2.5 to the prospective seller, buyer or assignee of any business or assets related to eRepublik Service or all or part of eRepublik Labs Ltd, ERPK LABS SRL, or any other member of our group of companies; and

4.2.6 to a third party if we are under a duty to disclose or share your personal data with that third party in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of use <https://www.erepublik.com/en/main/terms-and-conditions>, or to protect the rights, property, or safety of our group of companies, eRepublik Labs, our customers, other registered users or others. This includes exchanging information with third parties for the purposes of fraud protection and credit risk reduction.

4.2.7 to advertisers enabling them to display relevant advertising.

4.3 We will notify you when information about you may be provided to third parties in ways other than explained above, and you will have the option to prevent such information sharing at the time that we notify you. We will not transfer such information without your consent.

4.4 We do not disclose personal information about you to other third parties (including advertisers or marketing companies) except those set out in this policy, but we may provide them with aggregate anonymised information about eRepublik Service users. For example, we may inform them that 500 men aged under 30 have clicked on their advertisement displayed on eRepublik on any given day, or we might inform third parties regarding the number of unique users who visit eRepublik Services, the demographic breakdown of our community users of eRepublik Service or the activities that visitors to eRepublik Services engage in while on eRepublik Service. We may also use such aggregate anonymised information to help advertisers reach the kind of audience they want to target (for example, women in the southeast of Ireland) when displaying advertisements on our website.

4.5 It may be necessary to transfer your personal information outside of the European Economic Area (EEA). This may happen where our servers or suppliers and service providers are based outside of the EEA or where you use our services and products while visiting countries outside of the EEA. The data protection and other laws of these countries may not be as comprehensive as those in Ireland or the EU but in these instances we will take steps to ensure that your privacy rights are respected. You agree that we may transfer your personal data on that basis.

5. Security and control of your personal data

5.1 We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

5.2 Where we have given you (or where you have chosen) a password which enables you to access certain parts of eRepublik Service, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. You are responsible for the security of your password and our Terms and Conditions of Use https://www.erepubliklabs.com/files/uploads/Terms_and_Conditions_of_Use.pdf deal with this in more detail.

5.3 Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to eRepublik Labs; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. ***You acknowledge that we are not responsible for any intercepted information sent via the Internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorised manner.***

6. Legal basis for the processing of personal information

Insofar as we obtain the consent of the data subject for the processing of personal information, Art. 6 para. 1 lit. a GDPR serves as the legal basis.

If the processing of personal information required for the performance of a contract to which the data subject is a party, Art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to steps at the request of the data subject prior to entering into a contract.

Insofar as the processing of personal information is processing is necessary for compliance with a legal obligation to which we are subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis.

In the event that processing of personal information is necessary in order to protect the vital interests of the data subject or of another natural person, Art. 6 para 1 lit. d GDPR serves as the legal basis.

In the event that processing of personal information is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us, Art. 6 para 1 lit. e GDPR serves as the legal basis.

If processing of personal information is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal information, in particular where the data subject is a child, Art. 6 para. 1 lit. f GDPR serves as the legal basis for processing.

7. Links to third party websites

7.1 The eRepublik Service may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates as well as third party websites to which we have no affiliation. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and that we do not accept any responsibility or liability for these policies or for the activities on those websites.

8. Retention of personal information

The personal information will be deleted or access will be restricted as soon as the purpose of storage ceases to apply. The data will also be deleted or access will be restricted if a storage period expires, unless there is a need for further storage of the personal information for the conclusion or fulfilment of a contract.

9. Rights of the data subject

If your personal information is processed, you have the following rights vis-à-vis us. To invoke those rights, please send an email to privacy@erepubliklabs.com, specifying the type of request.

a) Right of access

You have the right to obtain from us a confirmation as to whether or not personal information concerning you are being processed, and, where that is the case, access to the personal data and the following information:

- (1) the purposes of the processing;
- (2) the categories of personal data concerned;
- (3) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (4) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- (5) the existence of the right to request from us rectification or erasure of personal data or restriction of processing of personal information or to object to such processing;
- (6) the right to lodge a complaint with a supervisory authority;
- (7) where the personal data are not collected from you, any available information as to their source;

- (8) the existence of automated decision-making, including profiling, referred to in Art. 22 para. 1 and 4 GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

You have the right to request information as to whether the personal data concerning you is transferred to a third country or to an international organization. In this context, you may request to be informed of the appropriate guarantees pursuant to Art. 46 GDPR in connection with the transmission.

b) Right of rectification

You have the right to obtain from us within undue delay the rectification of inaccurate or incomplete personal information. Taking into account the purposes of the processing, you shall have the right to have incomplete personal information completed, including by means of providing a supplementary statement.

c) Right to erasure ('right to be forgotten')

You shall have the right to obtain from us the erasure of personal information concerning without undue delay and we shall have the obligation to erase personal information without undue delay where one of the following grounds applies:

- (1) the personal information is no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- (2) you withdraw consent on which the processing is based according to Art. 6 para.1 lit. a GDPR or Art. 9 para. 2 lit. a GDPR, and where there is no other legal ground for the processing;
- (3) you object to the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate grounds for the processing, or you object to the processing pursuant to Art. 21 para 2 GDPR;
- (4) the personal information has been unlawfully processed;
- (5) the personal information has to be erased for compliance with a legal obligation in the European Union
- (6) the personal information has been collected in relation to the offer of information society services referred to in Article 8 para.1.

Where we have made the personal information public and is obliged pursuant to the above to erase the personal information, we, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

The right to erasure shall not apply to the extent that processing is necessary:

- (1) for exercising the right of freedom of expression and information;
- (2) for compliance with a legal obligation which requires processing by the European Union or for the performance of a task carried out in the public interest
- (3) for the establishment, exercise or defense of legal claims.

d) Right to restriction of processing

You shall have the right to obtain from us the restriction of processing where one of the following applies:

- (1) the accuracy of the personal data is contested by yourself, for a period enabling us to verify the accuracy of the personal data;
- (2) the processing is unlawful and the data subject opposes the erasure of the personal information and requests the restriction of their use instead;
- (3) we no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;

- (4) You have objected to processing pursuant to Art. 21 para. 1 GDPR pending the verification whether the legitimate grounds of us override those of the data subject.

Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State.

If you have obtained restriction of processing pursuant to the above, you shall be informed by us before the restriction of processing is lifted.

e) Right to data portability

You have the right to receive the personal information, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal information have been provided, where:

- (1) the processing is based on consent pursuant to Art. 6 para 1 lit. a or Art. 6 para 1 lit. b or Art. 2 para 2 lit. a
- (2) the processing is carried out by automated means.

The right shall not adversely affect the rights and freedoms of others.

In exercising your right to data portability you shall have the right to have the personal information transmitted directly from one controller to another, where technically feasible.

The exercise of this right shall be without prejudice to the right of erasure. That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

f) Notification regarding rectification or erasure of personal data or restriction of processing

We shall communicate any rectification or erasure of personal data or restriction of processing carried to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. We will inform you about those recipients if you request it.

g) Right to object

You shall have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning him or her which is based on Art. 6 para. 1 lit e) or lit. f). We shall no longer process the personal information unless it demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims.

Where personal information is processed for direct marketing purposes, you shall have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

Where you object to processing for direct marketing purposes, the personal information shall no longer be processed for such purposes.

At the latest at the time of the first communication with you, the right referred to above shall be explicitly brought to your attention and shall be presented clearly and separately from any other information.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise his or her right to object by automated means using technical specifications.

h) Automated individual decision-making

The you shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you

This shall not apply if the decision:

- a) is necessary for entering into, or performance of, a contract between you and us
- b) is authorised by European Union law and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or
- c) is based on your explicit consent.

We shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of us, to express his or her point of view and to contest the decision.

Decisions shall not be based on special categories of personal data unless Art. 9 para.2 lit. a) or lit g) GDPR applies and suitable measures to safeguard your rights and freedoms and legitimate interests are in place.

i) Right of complain to a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right of appeal to a supervisory authority, in particular in the European Member State where you reside, work or suspect of infringement, if you believe that the processing of personal information concerning you is not in compliance with GDPR. The supervisory authority to which the complaint has been lodged shall inform the complainant of the status and results of the complaint, including the possibility of a judicial remedy under Art. 78 GDPR.

10. IP addresses and cookies

10.1 The purpose of using technically necessary cookies is facilitate the use of the services to the users. Some functions of Services cannot be offered without the use of cookies. The purpose of technically not necessary cookies is the improvement of the Services.

The legal basis for the processing of personal information using technically necessary cookies is Art. 6 para. 1 lit. f GDPR.

The legal basis for the processing of personal information using cookies for analytical purposes is, in the case of existing consent, Art. 6 para. 1 lit. a GDPR.

Cookies are stored on the user's computer and transmitted to us. Therefore, you as a user have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by changing the settings in your Internet browser. Cookies that have already been saved can be deleted at any time. This can also be done automatically. If cookies are deactivated, it may no longer be possible to use all functions of the Services in full. The transmission of Flash cookies cannot be prevented via the browser settings, but by changing the Flash Player settings.

10.2 You consent to us using tracking technologies, such as cookies which are stored on the hard drive of your computer, web beacons and clear gifs, ("Tracking Technologies") which us to analyze the eRepublik Service's functionality, analyze technical issues, send useful notifications to user devices, track use of the eRepublik Service and generate reports and data models that we use to improve the eRepublik Service. On revisiting the Website our computer server will recognise the cookie, giving us information about your last visit. They help us to improve our Website and to deliver a better and more personalised service.

If you access the eRepublik Service from a mobile device, we may collect information about your device including (where available) your IP address, device alphanumeric IDs, operating system (iOS, Android, OS version) and browser type, device ID, brand and model, information regarding the used carrier, network type (Wifi/Mobile data), volume and status of data transmission, click-through statistics, the name of the domain and host from which you access the Internet, the date and time you accesses portions of the eRepublik Service.

11.3 Tracking technologies enable us

11.3.1 to estimate our audience size and usage pattern;

11.3.2 to store information about your preferences, and so allow us to customise eRepublik Service according to your individual interests; and

11.3.3 to speed up your use of the eRepublik Service and searches.

11.4 We use third parties, who we share your information with. These third party services may be embedded into the Services, such as through an API or SDK, or may take the form of Tracking **Technologies** which enable these third parties to collect information on our behalf and who may collect information from you to assist us with serving advertisements, fulfilling a purpose you requested of us (for example, billing services), customer support and feedback, analyzing the eRepublik Service functionality and technical issues, sending useful notifications to user devices, tracking use of the eRepublik Service and generating reports and data models that we use to improve the eRepublik Service.

11.5 Cookies are stored on the user's computer and transmitted to us. Therefore, you as a user have full control over the use of cookies. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. Cookies that have already been saved can be deleted at any time. The transmission of Flash cookies cannot be prevented via the browser settings, but by changing the Flash Player settings. However, if you select this setting you may be unable to access or use certain parts of eRepublik. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to eRepublik. For information on how to control your cookies go to www.allaboutcookies.org.

12. Access to information and updating, verifying and deleting personal data

12.1 At any time, you can make a written request to have access to all the personal information that we hold about you. We will provide this information to you and may request a small administrative charge.

12.2 If at some point you have registered for an account on our website, you can modify and update your personal information by contacting us via the Support Centre available in-game or at privacy@erepubliklabs.com. If you choose to delete your account, please contact us at privacy@erepubliklabs.com and request that your account be deleted. However, your username, avatar, bases, other in-game actions, elements or posts on the in-game chats shall remain recorded in the Game History. The only information that will accompany such posts will be your Username and avatar.

13. Changes to our Privacy Policy

13.1 Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. You should visit this page periodically to review any changes to the Privacy Policy.

14. User feedback and complaints, data protection officer

14.1 Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to privacy@erepubliklabs.com or via the Help & Support Menu available in-game.

14.2 Our data protection officer can be contacted at dpo@stillfront.com.