



PRIVACY POLICY

VERSION

15 April 2021

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1. Who we are

This Privacy Policy specifies the principles of processing (including collecting and use) of personal data by QED Software Sp. z o. o. with registered office in Poland, Warsaw (00-052), ul. Mazowiecka 11/49, entered into the register of entrepreneurs of the National Court Register, maintained by the District Court for the capital city of Warsaw, XII Commercial Division, KRS: 0000174197, with tax identification number NIP: 5262370692 (hereinafter “we,” “us” or “Data Controller” or “Controller”) along with the information on the rights of private individuals.

Personal data is processed by us for the purposes and in the scope indicated in this Privacy Policy.

2. Contact

If there are any questions regarding this Privacy Policy or want to address matters concerning personal data you may contact us by e-mail at: privacy@qed.pl , or by postal service to our address: QED Software Sp. z o. o.; ul. Mazowiecka 11/49, 00-052 Warszawa, Poland. As per Art. 37 of the GDPR such questions are to be addressed directly to the Controller, as no specific Data Protection Officer has been nominated.

3. General Scope

This Privacy Policy informs about the manner of protection of personal data of persons using the websites tacticaltroops.net, sensei.tacticaltroops.net, forum.tacticaltroops.net and other related websites, and the Sensei and Forum Services offered through these web sites and operated by the Controller, both as registered or unregistered Users (hereinafter referred to as , respectively, the “Users’ and the “**Service**”), according to the Regulation of the European Parliament and of the Council (UE) 2016/679 dated 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free flow of such data and revoking Directive 95/46/CE (General Data Protection Regulation); (hereinafter referred to as “GDPR”).

The content of the Service pages shall constitute the ownership of the Controller and is subject to legal protection.

4. Purpose and Legal Basis

Personal data of unregistered Users shall be processed - pursuant to Article 6.1.a) of GDPR, the processing shall be subject to consent with respect to such items cookies, and the Users may use the web sites anonymously if they do not consent, however some features may be inaccessible.

Personal data of the registered Users of our Service, for which they must consent to register, shall be processed:

- a. pursuant to Article 6.1.a) of GDPR, the processing shall be subject to consent, in order to provide access to the Service and send Service-related information by email as the case may be (provided the consent has been given).
- b. pursuant to Article 6 section 1 (b) of the GDPR (i.e. it is necessary for the performance of a contract to which the data subject is party)- for example in relation to the purchase of the game;
- c. pursuant to Article 6.1.f) of GDPR – legitimate interest of the Controller, in order to determine, investigate or protect against any claims, as the case may be or provide;

and in the cases in which the provisions of law authorise the Controller to process personal data. If we process data for purposes other than those arising from the Privacy Policy, the data subject shall each time be informed thereof.

If the processing is based on your consent, you may at any time withdraw your consent by contacting us using the Controller's contact information above.

5. Provision of personal data is voluntary

By using the web site, you consent to this Privacy Policy. Provision of personal data is voluntary, however it is necessary in order to become a registered User and enjoy the Services offered by the Controller.

6. Categories of Processed Data

You may visit our site without registering. In such case upon your consent we will process the data related to the technical connection with our web sites and statistics (see: Cookies).

For registered Users, we collect their information when they register on our site and gather data when they use the Sensei Service and participate in the forum by reading, writing, and using the content shared here.

If you choose to register and log in, you may be asked to select a username for yourself and enter your e-mail address. You may add your full name optionally. Your e-mail address will be verified by an email containing a unique link. If that link is visited, we know that you control the e-mail address.

When registered and posting, we record the IP address that the post originated from and the information that you submit by posting or commenting on Forum. We also may retain server logs which include the IP address of every request to our server.

If you are a registered user of the Service and has purchased the game Tactical Troops via online gaming service, we may also process your identification tag that that service shared with us (This is referred to as “linking accounts” – please check the Privacy Policy of the Steam gaming service at https://store.steampowered.com/privacy_agreement/)

7. What do we use your information for?

Any of the information we collect from you may be used in one of the following ways:

To personalize your experience — your information helps us to better respond to your individual needs.

To identify you as a registered User and enable your use of the Service and Forum, e.g. by recording your game results and forum messages

To improve our site and Service — we continually strive to improve our site offerings based on the information and feedback we receive from you.

To improve customer service — your information helps us to more effectively respond to your customer service requests and support needs.

To establish a channel of communication with registered Users and send occasional emails related to the Service you registered for — such as the information, notifications that you request about changes to topics or threads, responses to inquiries, and/or other requests or questions.

8. Retention period of personal data:

Period for which the Controller will be storing the personal data of Users depends upon the purpose of processing:

- a. based on the User’s consent for the processing of personal data – until the moment of completion of the purpose of such consent or the consent withdrawal, whichever is first;
- b. as regards performance of contractual obligations – until such obligations are fulfilled;
- c. as regards determining and pursuing own claims of the Controller or protection against claims submitted – until the expiration of the period of limitation of potential claims;

Following said periods, personal data provided by the User or Participant shall be deleted or subject to full anonymization.

9. Storage

We hereby declare that we will not transfer any personal data entrusted to us outside the territory of the European Economic Area. We store our data on machines located in Poland or other EU Member states. Data is regularly backed up to enable restore.

10. Recipients of data

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our site, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety. The personal data collected by the Controller may be directly accessed only by the Controller's authorised employees or contractors.

11. Third party links

Occasionally, at our discretion, we may include or offer third party products or services on our site, such as the gaming service where the game Tactical Troops can be purchased. Such third party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

12. Safeguards and protection

The Controller represents that the personal data of Users shall be processed according to GDPR and that technical and organizational measures be applied to ensure the protection of data subject to processing, considering the hazards and category of data being protected, and in particular the data of Users against unauthorised access, loss or damage.

13. Profiling

You understand that within the processing of data, referred to above, there will be no automated decision making process and the Users' data will not be subject to profiling in the meaning of GDPR.

14. Cookies

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow). These cookies enable the site to recognize your browser and, if you have a registered account, associate it with your registered account.

We use cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

There are 4 categories of cookies that may be used:

- a. necessary for the proper functioning of the web site;
- b. preference-registering cookies
- c. statistics cookies that verify web site visits
- d. marketing cookies are used to track visitors across websites and help identify services and products more suitable for a given user

They may also be divided depending on their lifetime, ranging from 1 session, 1 day, through persistent ones that may stay on the device longer, to permanent or semi-permanent ones.

According to the applicable regulations, the User has the right to decide on the scope in which cookies will have access to their computer by making the appropriate choices in the website settings through a cookie information window with disabling option. We use third-party service provider to assist us cookie management, and you can refer to our Cookie Preferences tab for more detailed information.

Cookies originating from the websites of third parties, in particular YouTube or Google may be stored on the User's device. Information regarding cookies from these websites can be found on the website of their respective owners.

15. Accountability

Data Controller shall not be liable for any actions or omissions of Users, as a result of which the Controller shall process their personal data in the manner specified in this Privacy Policy.

Data Controller reserves the right to amend, cancel or modify the functionalities or properties of the websites and Service web pages, and to cease its activities, assign rights to the Service and perform any and all legal actions permitted under applicable laws. Any and all actions performed by the Controller must not infringe the rights of the User or the Participant.

16. Rights of personal data subjects

We will cooperate with you in order to ensure compliance with applicable data protection provisions, e.g. to enable you to effectively guarantee the exercise of data subjects' rights that are as follows:

- a. access the contents of their personal data and receive copies thereof;
- b. rectify their personal data;
- c. demand the erasure of their personal data; however, if the given data subject has expressed consent to the processing of their personal data, a demand for the erasure of their personal data shall have the same effect as withdrawal of the consent;
- d. demand a restriction of processing of their personal data;
- e. transfer their personal data;
- f. object the processing of their personal data;
- g. withdraw their consent (in the event that the Controller processes data based on such consent) at any time and without prejudice to the lawfulness of processing carried out pursuant to the consent prior to its withdrawal;
- h. lodge a complaint with the supervisory authority regarding the violation of their right of data protection by the Controller or other rights granted pursuant to the provisions of the GDPR. The supervisory authority in Poland shall be the President of the Personal Data Protection Office.

In order to exercise the aforementioned rights, a data subject should send us an e-mail at contact@qed.pl indicating: a) which right they wish to exercise, b) in what scope and c) in what manner. Please provide your contact details which will enable us to contact you quickly during the handling of your request – in particular where it may be necessary to confirm the identity of the applicant or the exact right the applicant wishes to exercise as well as the scope in which they wish to exercise it (telephone contact is preferred, although it is not obligatory).

17. Changes to our Privacy Policy

Data Controller reserves the right to modify this Privacy Policy, whenever required by the provisions of law or changes in the Service. Data Controller shall notify the site and Services about any appropriate changes and the date of their entry, in particular by way of a communication on the Service page and the sites.

This Privacy Policy was last modified on 15.04.2021 (the date of entry of this Privacy Policy).