

PRIVACY POLICY

Updated 2022/09/25

This document describes the Privacy Policy of WILLIWAW HUB, UNIPESSOAL LDA, business ID Number PT515478377, (hereinafter referred to as “WILLIWAW”, “the company”, “we,”, or “us”, or “our”), in relation to the data collected from the user (you) by us and by our third party partners, when you use the following websites and services:

- By visiting the website www.williwawhub.com
- By downloading and playing the game apps distributed under the Williwaw Hub developer (hereinafter, “the apps” or “our apps”) accessible at third party app stores like Google Play, App Store, Amazon Apps, Steam, etc.

By downloading, accessing and/or playing our apps at a mobile device, or interacting with our website, you agree to the collection and use of your information in accordance with this Privacy Policy, including consenting to the company’s and our advertising partners’ use of your data for targeted advertising purposes as described in the [Marketing](#) and [Advertising](#) sections of this Privacy Policy. Those sections also explain how you can withhold or withdraw your consent to the use of your data for targeted advertising purposes. If you have any other concerns about providing information to us or it being used as described in this Privacy Policy, you should not use our games or other services.

Playing our game apps

By downloading, accessing and/or playing our apps at mobile devices you agree to the collection and use of your information with the purpose of properly delivering our services to you. Most of this data is not linked to your personal identity and comes directly from you or your device, such as device information, country and region, and game play information. We use this data to provide our games and services to you, including for the purposes of service optimization, enhancing user’s playing experience, preventing fraud, customizing in-game offers and verifying purchases.

The ordinary use of our mobile applications generates technical data about how you use and interact with our games (game sessions, session duration, events triggered, etc.), which must be stored to guarantee your progress as a player. It may also generate data about how you use and interact with advertising placed at our apps, which is provided by third party advertising partners.

Whenever you purchase in-app products of ours we have to send and request payment-related type of data to the app store provider in order to complete the transaction, which we may need to cache temporarily but in a way that is unreadable by us. This technical and payment-related data does not include any user identifying data and it is hosted at third party servers (app store servers, Firebase, etc.). We do not collect or retain credit card information.

Advertising

Our games may include advertising for third party products and services. This advertising will be targeted or interested-based when possible.

We and our advertising partners collect and use information about you to improve advertising, targeting and measurement systems so that we can show you relevant third party ads in our games.

Where applicable, we use an in-app page that is shown prior to allowing you access to the game to gather consent and permissions for our advertising based activity. Where local laws allow, we may opt you into interest-based advertising by default. You can change your preferences at any time by contacting our support email.

How to withdraw your consent to targeted advertising

You can withdraw your consent to interest-based advertising anytime at your device.

To disable the personalized advertising at Android devices, open the Settings, navigate to Privacy > Ads, and click on "Delete advertising ID", or on "Opt out of Ads Personalization". For more information on Android advertising ID and how to opt out, please read <https://support.google.com/googleplay/android-developer/answer/6048248?hl=en>.

To disable the personalized advertising at iOS devices, go to Settings > Privacy > Apple Advertising, and Turn off Personalized Ads. For more information on iOS advertising ID and how to opt out, please read <https://support.apple.com/en-us/HT202074>

Marketing

Unless you opt out as explained at Advertising section, we and our third party partners may use information collected about you to send you marketing communications about other our games and related services based on your interests. For example, we may send emails, or serve ads within our services, or place ads on third party websites.

We may also offer you to subscribe to our newsletters in order to receive direct marketing communications from us, to keep you informed of our activity, or send you satisfaction surveys. You can unsubscribe from these communications anytime directly from any marketing communication that we send to you by clicking on the Unsubscribe link.

Cookies, ad identifiers, similar technologies, and why we use them

In order to monitor and prevent unauthorized uses or activities that may be illegal (eg, to maintain and guarantee security in case of attacks to our computer systems), we store technical information, of an anonymous nature, on the equipment from those who access our hosting servers, such as your IP address.

Additionally, through the installation on your computer or mobile device of a type of programs commonly known as "cookies", we collect anonymous information about your browsing history, necessary for our website and application to be properly displayed on your computer or device. This information, which does not include personal data, will be stored and used privately, for the development of analytics and statistics and improve our website and application, as well as to adapt our offers to your preferences. You may refuse to provide us with such information by preventing the installation of "cookies" through the configuration options of your browser, but certain services may not work properly if you do so. Please, consult the instructions and manuals of your browser for further information.

We use ad identifiers and similar technologies to allow us and our third party advertising partners to recognize your device when you use websites and applications and to deliver interest-based advertising.

Cookies, ad identifiers and similar technologies like JavaScript or Web Beacons, allow us and our third party advertising partners, to recognize your device; to recognize your language in order

to show you our services in the correct language, and other similar customization options; to allow us to understand how you interact with our websites (with third party technology like Google Analytics); to provide interest-based advertising within our games and/or websites; and to allow our payment processors to process your payment instructions.

Cookies are small text files that are stored by your browser on your desktop computer or mobile device. You can withdraw your consent to cookies by updating the settings within your browser.

Ad identifiers are non-permanent, non-personal identifiers such as the Android advertising ID (AAID) and Apple's ID for advertising (IDFA); they are uniquely associated with your device and enable most third party tracking on mobile devices. Similar technologies include tracking pixels within ads.

Age restrictions

Our games and content are designed and intended for different types of audiences. As for game apps, each title has its own age rating, which indicates the age from which a content is suitable for, which is stated within the title's store page at the content store where it is downloadable from (Google Play, App Store, etc.). Please read carefully the age rating of the content you wish to purchase/download prior to accessing a title, and make sure you are of the age or older.

ARCO rights, GDPR Data Protection Rights, and CCPA Rights

Owners of personal data have the following rights:

- Right of access is the right every person has to request and obtain information regarding what personal data is being processed, by whom, and for what purpose.
- Right of rectification is the right every person has to rectify their personal data, when it is inaccurate or incomplete.
- Right of cancellation/ to erasure personal data is the right every person has to cancel or erase their personal data when it is inadequate or unnecessary.
- Right to restrict processing is the right every person has to restrict to the processing of their personal data, when there is not a sufficient reason for it.
- Right of opposition/to object to processing is the right every person has to oppose to the processing of their personal data based on legitimate interests, when there is not a sufficient reason for it.
- Right to data portability is the right every person has to request that the data that has been collected about him/her is transferred to another organization, or directly to the owner, under certain conditions.

Under the CCPA Privacy Rights, consumer residents in California, USA, have the right to:

- Right to know and request to the list of personal data and categories of personal data we as a business are collecting from you as a consumer and the purpose.
- Right to delete and request that we delete any personal data that we have collected about you as a consumer.
- Right to opt-out of sale and request that your personal data is not to be sold to other parties. Please note that, in this case, if you opt-out of the sale of your personal data, we will stop selling your data, including to our advertising partners, but you may still be able to see advertising at our games and websites, and third party advertisers may still hold previous information about you.

- Right to non-discrimination for exercising your CCPA rights. We will not deny you any goods or services, charge you a different price, or provide a different level of goods or services just because you exercise your CCPA rights.

The fastest and easiest way to exercise most of these rights is by accessing your user account and check/correct/update/erase your personal data at the website/s and/or game store/s where you signed up as a user and created an account at.

In the case of Advertising and Marketing, you can opt out anytime as explained in the above sections.

In the case of Cookies, you can withdraw your consent anytime at your browser settings.

In any case, to exercise these rights you can contact WILLIWAW by sending an email to info@williwawhub.com, including your name and surname, indicating the right you are exercising and the data you are exercising the request upon, and attaching a photocopy of your official identification card or document.

Through the same channels you can also revoke your consent to the use of your contact data for advertising purposes, market research or development of satisfaction surveys at any time, without retroactive effect.

Please note that, even if you opt out of certain types of processing, if you continue to use our goods and services there will always be a certain type of data collected from you, whenever is necessary to deliver the goods and services properly to you. If you do not wish us to collect any personal data from you at all, you should stop playing or games or consuming our services, and, ultimately, delete our games from your devices.

Legal Basis

In accordance with the General Data Protection Regulations, users are informed that the legal basis on which the processing of personal data described in this Privacy Policy is based is, principally, the full execution of the contract of the provision of services perfected upon the acceptance of the terms of use of the WILLIWAW web or applications, and on a secondary basis, the users' own consent.

If a user refuses to supply the data requested by us or to consent to the described treatments, including those not related to the provision of the contracted services, he or she may be prevented from using the Service.

We collect and process data based on the following legal bases:

- Performance of a contract. We collect data that is necessary to be collected in order to provide you with the services and goods that you freely request us to provide you with (games, customer services, technical support).
- Legitimate interest. We collect data that is reasonably expected to be collected while you make use of our services and goods and that does not harm your privacy, for the purpose of analytics, game optimization, advertising, and marketing.
- Legal requirement. We collect and share certain data because we have a legal obligation to do so (for example, for tax obligations).
- Consent. You consent to the collection of data stored on your device by us and our advertising partners (which includes device information, ad identifiers, IP address, country and region) when you agree to install our game, and you can withdraw your

consent to this by uninstalling our games. You consent to the storage of data on your device by us and our advertising partners, which includes the use of cookies, when you access and use our services and goods, and you can withdraw your consent by updating your cookie settings at your browsers. And you consent to the use of your data by us and our third party partners for interest-based advertising purposes as listed at the sections [Advertising](#) and [Marketing](#) above, when you accept this Privacy Policy, and you can withdraw your consent to this processing by following the steps at [How to withdraw your consent to targeted advertising](#).

Sharing

- We share data where you have consented to share.
- We share data with third parties whenever it is necessary in order to provide you with the services and goods that you request/contract from us (for example, for you to complete a purchase, you may have to share personal information with us that we must send to the payment processors).
- We share data with third parties whenever it is reasonably necessary for them to provide us with a service that we are offering to you (for example, when our apps are free to play and are monetized via in-app advertising, we share ad identifiers with third party advertising partners in order to be able to serve in-app ads).
- We share data when it is of anonymous and/or aggregated nature and you can't be personally identified from it.
- We share data when we have a legal obligation to do so.

Security

We take the appropriate measures to store your data securely and protect it from unauthorized access, loss, and misuse, and we work with third party suppliers that ensure appropriate levels of data protection. However, you should always take care when sharing and storing your online and offline information, as the internet is not a 100% secure place by nature, and there will always be threats and risks (hackers, malware, spyware, etc.).

Modifications

The Privacy Policy contained on this page may suffer updates, due to changes in legal requirements or improvements and changes on the way we offer and deliver our products and services. These changes will be duly announced in the portal of the website and / or mobile application, and will be effective with the user's subsequent access to them. Notwithstanding the foregoing, we recommend that you visit this page periodically to be able to consult the applicable terms at any given time.

Contact us

If you have any questions about our Privacy Policy, and or wish to exercise your rights, contact us:

- By email to info@williwawhub.com or
- In writing to WILLIWAW HUB, UNIPESSOAL LDA, Av Arriaga, 30 1 Andar, Sala A, 9000-064 Funchal, Madeira, Portugal

