

Data privacy statement of astragon Entertainment GmbH – Construction Simulator

I. General information

Thank you for your interest in our games and welcome! We are astragon Entertainment GmbH, Am Wehrhahn 33, D-40211 Düsseldorf. You can reach us via info@astragon.de

Our aim

Protecting your privacy is paramount to us. Therefore, compliance with the legal provisions on data protection is fundamental for us. In addition, it is important to us that you know at all times which personal data we collect and why and how we process it. We will also be happy to explain to you what rights you have and how you can exercise them.

What is personal data?

In short, anything that identifies you as an individual, whether through the information itself or in connection with other information. Examples of this are your name, your e-mail address or a customer number, but also the time at which you started a multiplayer game when it is stored together with your IP address. We always try to collect as few personally identifiable information as possible. But we also like to inform you in detail in this document about your personal data when we collect them.

Why is this document so long?

In regard to all personal data, we are required by law to describe to you in detail:

- What kind of personal data do we collect? (= type of data collected)
- Which law, rule or regulation allows us to do so (= legal basis)
- Why we collect this data (= purpose of use)
- What exactly happens to your data (= type of processing)
- How long do we store your personal data
- What rights you have with regard to your personal data (= rights of data subjects)

We are required to list each step individually. That is the reason why this document is very comprehensive.

1. Competent supervisory authority & company data protection officer

Responsible in terms of the European General Data Protection Regulation (GDPR) are we,

astragon Entertainment GmbH

Am Wehrhahn 33, D-40211 Düsseldorf.

info@astragon.de

For all **data protection inquiries**, please contact our company **data protection office**. Contact details:

datenschutz@astragon.de

Benjamin Wolf

2. Legal basis

We collect and process personal data on the basis of the current European law. The following legal bases can be found in the General Data Protection Regulation (GDPR). Depending on the purpose of the data collection, one or more of the following legal bases apply:

- The data subject has given consent to the processing of his or her personal data as referred to in **Art. 6 (1)(a) General Data Protection Regulation (GDPR)**.

Consent is an expression of will. This can be done in writing in form of a statement or with another clear affirmative action. Either way, the consent must be voluntary, apply to a specific case, and must clearly state that the data subject agrees to the processing of his or her respective personal data. For this purpose, the data subject must be sufficiently informed and understand the consent.

- Processing is necessary for the performance of a contract prior to entering into a contract as referred to in **Art. 6 (1)(b) GDPR**.

That means: The data is required so that we can fulfill our contractual obligations towards you or we need the data to prepare a contract with you.

- Processing is necessary for compliance with a legal obligation as referred to in **Art. 6 (1)(c) GDPR**

That means: For example, we are required by law or other regulations to process the data.

- Processing is necessary for the purposes of the legitimate interests as referred to in **Art. 6 (1)(f) GDPR**

That means: The processing of data is necessary to protect the legitimate interests of us or third parties, unless your interests or fundamental rights and freedoms that require the protection of personal data prevail.

3. Rights of the data subject

When it comes to your personal data, you are the data subject. You are entitled to the following rights with regard to the data processed by us in accordance with the articles of the General Data Protection Regulation referred to in each case:

- **Right of access by the data subject** as referred to in Art. 15 GDPR
- **Right to rectification** as referred to in Art. 16 GDPR
- **Right to erasure** (“right to be forgotten”) as referred to in Art. 17 GDPR
- **Right to restriction of processing** as referred to in Art. 18 GDPR
- **Right to data portability** as referred to in Art. 20 GDPR
- **Right to object** as referred to in Art. 21 GDPR

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular with the EU Member State of your place of residence, place of work or place of alleged infringement, if you believe that the processing of your personal data violates the GDPR.

4. Data erasure and storage time

Personal data must be erased if they are no longer necessary in relation to the purposes for which they were collected or otherwise processed. In addition, storage may take place if provided for by the European or national legislator in EU regulations, laws or other regulations to which the controller is subject. The data will also be

blocked or erased if a storage period required by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or fulfillment of a contract.

II. Specific data processing

1. Do we collect personal information when you play our games on a console?

We do not collect any personal data when you use our games on a Microsoft console. If and to what extent personal data are collected and processed by Microsoft in the context of the use of games or other services, please read the respective privacy statements of the respective provider.

2. Google Analytics

a) Scope of data processing

Our game uses Google Analytics, an analytics service Google Ireland Limited.

Gordon House, Barrow Street

Dublin 4

Ireland

Tel: +353 1 543 1000

Fax: +353 1 436 1001

Email: support-de@google.com

- hereinafter referred to as "Google".

This software collects information about how you use our game and compiles various statistics from it. The usage data collected includes, in particular, the specific length of time spent in the game and the order in which the game is used or the frequency with which the game is played and other gameplay Data. This data is collected together with your IP address. The IP address transmitted by your browser as part of Google Analytics will not be merged with other Google data.

Google Analytics uses data stored on your computer to analyse your use of the game. The information generated about your use of the game is usually transmitted to a Google server in the USA and stored there. We have activated so-called IP anonymisation on our website, i.e. the IP address is shortened beforehand by Google within member states of the European Union or in other contracting states to the Agreement on the European Economic Area before being transferred to the USA.

Only in exceptional cases will the full IP address be transmitted to a Google server in the USA and shortened there. Google itself describes its data processing activities here <https://www.google.com/policies/privacy/>.

b) Legal basis

The legal basis for the processing of data when using the game is Art. 6 para. 1 lit. a GDPR. You give your consent when entering the game in the form of confirmation in our tracking pop-up. The legal basis for the transfer of data to Google is Art. 26 (3), 6 GDPR in conjunction with the use of the standard clauses of the EU Commission.

c) Purpose of the data processing

The processing serves the purpose of analysing the game and the usage behaviour of its players.

d) Duration of storage

The data is anonymised immediately after collection. Personal data is therefore only collected in the course of transmission and is not stored permanently.

e) Possibility of objection and deletion

You can prevent the collection of your usage-related data (incl. your IP address) and its transmission to Google as well as the processing of this data by Google by deactivating the "Analytics" option in the configuration menu of the game. If you also deactivate this option for the multiplayer mode, it can no longer be used for technical reasons.

3. Save Data in Multiplayer

a) Scope of data processing

If you play the game in Multiplayer, your save data will be stored online on a server operated by Photon, Exit Games GmbH, Germany, Hongkongstraße 7, 20457 Hamburg (<https://dashboard.photonengine.com/en-US/account/privacyandcookiepolicy>). The save data also contains your User ID, i.e. the customer number assigned to you by the respective platform you are playing on and your user name. In addition to the current progress in the game, the save data also contains logs, i.e. in game actions.

b) Legal basis

The legal basis for the processing of data is Art. 6 (1)(b) and (a) GDPR. The legal basis for storing the data with the hosting service provider "Photon" is Art. 28 (3) GDPR. The game cannot be used without the corresponding consent.

c) Purpose of the data processing

The purpose of data storage is to provide secure storage of save data both with regard to data loss at the customer, the possibility for each computer to use its own save data and protection of the save data against manipulation.

d) Duration of storage

The data will be stored until you decide to delete the save data. This can be done directly in the game in the save data menu.

e) Possibility of objection and deletion

The user may always delete the save data in the save data menu of the game. Local storage without using our servers is not possible for data security reasons.

The game cannot be used without consent to its storage on our servers.

4. In-game News

When contacting our servers to retrieve news, your IP address will be collected solely for the purpose of performing the communication and will not be stored. This is done by our hosting provider "Strato AG" on the basis of order processing according to Art. 28 (3) GDPR. The legal basis for us is Art. 6 (1) lit. b or f GDPR, ie legitimate interests or the fulfilment of our contractual relationship with you. The legitimate interest is to inform you about news about the product. A right of objection does not exist, since the registration is technically conditioned and without this the communication process would not be possible.