

**ZERO SIEVERT**

**PRIVACY NOTICE**

(Last updated November 2022)

1. INTRODUCTION	
Who are we?	<p>We are Modern Wolf Limited, a company incorporated and registered in the United Kingdom, with registered number 11956982, and whose registered office is situated at Third Floor One London Square, Cross Lanes, Guildford, Surrey, GU1 1UN ("<b>Modern Wolf</b>", "<b>we</b>" or "<b>us</b>"), and we are a videogame publisher.</p> <p>Where we decide the means or purpose of processing your personal data, we are the "controller."</p>
What's this notice about?	<p>This notice explains how we process personal data, as a controller, relating to players ("<b>Players</b>", "<b>you</b>" and "<b>your</b>") of our game: "ZERO Sievert" (the "<b>Game</b>").</p> <p>We update this notice from time to time, so you should check back in on a regular basis. Where appropriate, we will actively notify you.</p> <p>Please note that other websites or services mentioned or linked to in-Game are not operated by us, and you should refer to the privacy policies on those websites to understand how their personal data is being used.</p>
What are your rights?	<p>You have the following rights, although these rights may be limited in some circumstances:</p> <ul style="list-style-type: none"><li>● Ask us to send a copy of your personal data to you or someone else</li><li>● Ask us to restrict, stop processing, or delete your personal data</li><li>● Object to our processing of your personal data</li><li>● Object to use of your personal data for direct marketing purposes</li><li>● Ask us to correct inaccuracies in your personal data</li></ul> <p>If we rely on consent to process personal data you can withdraw consent at any time.</p> <p>To make a request to exercise your rights, please let us know by sending an email to the email address set out below.</p> <p>You also have the right to submit a complaint to a supervisory authority. For example, in the United Kingdom, you can get in contact with the Information Commissioner's Office ("<b>ICO</b>"): <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>. If you live in a European country, you can alternatively submit a complaint to the supervisory authority in your country.</p>
How do you contact us?	<p>If you have any questions concerning this notice, including how you can exercise your rights, please contact us at: support@modernwolf.net</p>

2. YOUR PERSONAL DATA AND HOW WE USE IT		
Your personal data	How we use it and our legal justification for doing so	Sources & recipients
<p>We process the following personal data, which may be associated with a unique identifier for you:</p> <p>(i) when and how often you play the Game and whether you are a new or returning Player;</p> <p>(ii) which weapons and other equipment or functionality you use; and</p> <p>(iii) which maps you play, and whether or not you survive.</p> <p><u>Collection and Retention</u></p> <p>We use this data in aggregated form only, and not to build a profile or similar in respect of any single individual.</p> <p>Raw data is kept for up to 24 months, but once it has been aggregated and anonymised we may hold onto it indefinitely.</p>	<p>We process this personal data to understand how, and how often, our Game is played.</p> <p><u>Legal Basis</u></p> <p>We process this personal data where you have given us your consent to do so.</p> <p><u>More Info</u></p> <p>The analytics tool we use to collect this data is operated by GameAnalytics.</p> <p>If you have given your consent to use of this analytics tool, GameAnalytics will also collect certain personal data.</p> <p>We are not the controller of that processing, and you can find more information about GameAnalytics and their processing of personal data here: <a href="#">Privacy Policy - GameAnalytics</a>.</p>	<p>GameAnalytics provide the software and infrastructure we use to process this data.</p>

3. STORAGE, TRANSFERS AND DISCLOSURE	
Storage & Transfers	<p>We are based in the United Kingdom, regularly collaborate with an international network of partners and may, from time-to-time, use subcontractors and service providers based in other countries. Where we transfer your information outside of the United Kingdom, we will have agreements in place with the recipient which include standard data protection clauses adopted by the ICO to ensure that appropriate safeguards are in place to protect your personal data. For more information, drop us a line using the contact details at the start of this notice.</p>
Disclosure	<p>We may disclose your personal data:</p> <ul style="list-style-type: none"> <li>• Where required by law, government, competent authorities or the courts or to establish, exercise or defend our legal rights, and for the purposes of preventing crime and fraud (for example, we may share personal data with our professional advisors, investigators, or credit reference agencies).</li> <li>• With suppliers and subcontractors, as necessary for the purposes set out in this notice.</li> <li>• With other members of our corporate group and our international network of partners.</li> <li>• If involved in an investment, merger, acquisition, or sale of our organisation or assets, personal data we hold may be shared on the basis of the legitimate interests of us, our shareholders, customers and other parties to a transaction, unless those interests are outweighed by prejudicial impacts upon you.</li> </ul>

#### 4. COOKIES, ANALYTICS AND SIMILAR TECHNOLOGIES

Cookies, pixels and other technologies store and access data on your device to help websites and apps work. This table explains their purpose, how long they last, and who else can access their data. We get your consent to use them unless they're essential for our sites, apps or services.

Cookie/Tech	Duration	Purpose	Access
GameAnalytics SDK	The SDK is included within the Game and the ID assigned to your device lasts until you delete the Game.	To determine whether you are a new Player, or an existing Player, of the Game and to track those events discussed earlier in this policy.	We use GameAnalytics, who are a third-party analytics service provider, and you can access their privacy policy here <a href="#">Privacy Policy - GameAnalytics</a> .