

This privacy policy was last modified on 2 August 2023

Introduction

Green Horse Games develops and publishes social games for the web. Our Privacy Policy applies only to the collection, use and disclosure of personal information that you may decide to provide to us in your use of: (i) our applications for mobile platforms or devices and our web applications accessible on third party social networking services ("SNS") (collectively, our mobile and web applications are referred to herein as ("Green Horse Games Applications"), (ii) our web domains and subdomains (collectively, our "Sites"), and web forums or messaging boards in Green Horse Games Applications and our Sites (collectively, our "Forums"). (iii) our online games and game services whether reached through a third-party service or directly through our website or our downloadable games (collectively, our "Games"). These available options for users to interact with Green Horse Games are collectively known as our "Services". For the purposes of the Privacy Policy, Green Horse Games SRL, a company registered in Romania with its office located at 21, Aleea Fizicienilor Street, 1F Block, 2nd stair, 4th floor, flat 27, District 3, Bucharest, Romania shall be referred to as: "Green Horse Games", "we", "us", or "our".

We reserve the right to update this Privacy Policy at any time. If we modify this Privacy Policy in a material way, a notice will be posted in our Services and on the Sites along with the updated Privacy Policy. We will also update the "Last Updated Date" in the Privacy Policy. By continuing to access or use the Services after we have posted an updated Privacy Policy or have provided you with notice of a modification, you are indicating that you agree to be bound by the modified Privacy Policy. If the modified Privacy Policy is not acceptable to you, your only recourse is to cease using the Services.

The following policy states the practices that may impact you as a registered user with full access to our Services or a non-registered user of our Services (each a "Green Horse Games User"). For information regarding the collection and use of Personal Information (defined below) from children under 13 years old, see Section 6 below, entitled "Our Policy Toward Children".

Information we collect

In the course of using our Services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to, your name, phone number, photo representation ("avatar"), email address and mailing address

("Personal Information"). We will collect, use, transfer and disclose Personal Information in accordance with our Privacy Policy.

We also collect non-personal information, which is data in a form that does not permit direct association with you or any specific individual ("Non-Identifying Information"). Non-Identifying Information is aggregated and used to help improve our Services and Third Party Mobile Applications (defined below) by providing a better way to understand the Green Horse Games User experience with the level of interest in various portions of our Sites, specific Green Horse Games Applications or specific Third-Party Mobile Applications. We may collect, use, transfer and disclose Non-Identifying Information for any purpose; details provided in this Privacy Policy about what Non-Identifying Information we collect currently, and how we use, transfer and disclose such Non-Identifying Information concern only how such information is collected and used today.

Either Personal Information or Non-Identifying Information may be used alone or in the aggregate with information collected from other Green Horse Games Users. Our primary objective in collecting any Personal Information or Non-Identifying Information is to provide you with a superior and personally relevant user experience.

Collecting Information

In connection with registration of Green Horse Games Users on our Services, we collect Personal Information that may include your email address, as well as information on mobile device type, mobile carrier, unique mobile device identifier ("Device ID"), Internet Protocol ("IP") address and geolocation, as applicable. We use your Device ID and IP Address to make it possible to authenticate and understand your use of our Services, or the Third Party Mobile Application that you may choose to access through our Services. We also use the IP address as a way to ensure that the Terms of Services are followed and to protect the security of our other users.

Related to this information collection, our Services may serve ads that contain links to other Third-Party Mobile and Web Applications, and we may utilize your Device ID to track clicks or other ad fulfillment metrics. Our use of your Device ID does not enable us to identify you personally, and we do not store this information in connection with your Green Horse Games User account information. You may also be asked explicitly to provide Personal Information or Non-Identifying Information anytime that you are in contact with Green Horse Games.

Additional Collection of Information:

Personal Information that you independently submit to an SNS (e.g., Facebook) may be collected and used by us in order to provide you with enhanced functionality. In these instances, you consent to Green Horse Games's access and use of your username, alias and any other Personal Information you have independently provided to and made accessible through the SNS. Such access will be in accordance with the privacy settings you have set in your SNS account, if any. Similarly, we may use Personal Information that you have provided to us to help you establish social connections with other Green Horse Games Users.

When you use any Green Horse Games game at an SNS such as Facebook or Google +, where our games may also be referred to as "applications", you allow Green Horse Games to access certain information from your profile for that site. The information you allow Green Horse Games to access varies by game and SNS, and it is affected by the privacy settings you and your friends establish at the SNS. You can control and find out more about these settings at the SNS where you play our games. For example, Green Horse Games may access and store some or all of the following information, as allowed by you, the SNS and your preferences:

- Your first and last name
- your profile picture or its URL
- your user ID number, which is linked to publicly available information such as name and profile photo
- the user ID numbers and other public data for your friends
- the login e-mail you provided to that SNS when you registered
- your gender

By playing a Green Horse Games game through an SNS, you are authorizing Green Horse Games to collect, store, and use in accordance with this Privacy Policy any and all information that you agreed the SNS could provide to Green Horse Games through the SNS Application Programming Interface ("API").

If you choose to participate in a Promotion, We may request that you provide us with Personal Information such as your email address or mailing address in order to administer your participation in the Promotion.

When you interact with the Service (whether or not on an SNS), or any Green Horse Games-owned games, website including Webshop, We may collect and store information from you directly as described below:

Payment Information

If you purchase a license to use in-game virtual currency or virtual items directly from Green Horse Games, we will collect the billing and financial information necessary to process your charges, which may include your postal and e-mail addresses. Green Horse Games may also receive the billing and payment information that you provide when your purchase is processed by another party, such as Facebook (for Facebook Credits). Our Terms of Service explain our policies and terms relevant to our charges and billing practices.

Payment processors:

For Mobile Games we use payment processors such as Google (if you run Android on your mobile device), Apple App Store payments (if you run IOS on your mobile device). To process payments on the Website, we rely on Xsolla Inc. These payment processors are responsible for the processing of your Information, and may use your Information for their own purposes in accordance with their privacy policies as below:

- Xsolla: <https://xsolla.com/privacypolicy>
- Apple: please see the App Store & Privacy policy available on your Apple device. <https://www.apple.com/legal/privacy/>
- Google: <https://policies.google.com/privacy>

Technical and Usage Information

When you access our websites or play our games, We collect (i) certain technical information about your mobile device or computer system, including MAC Address, IP Address and mobile device ID; and (ii) usage statistics about your interactions with the Service. This information is typically collected through the use of server log files or web log files ("Log Files"), mobile device software development kits and tracking technologies like browser cookies to collect and analyze certain types of technical information; and (iii) game play information that tracks and stores your interaction with our Games. Some of the cookies the Service places on your computer are linked to your user ID number(s). For more information on how We utilize cookies and other tracking technologies please review the "Cookies and Automated Information Collection" portion of the section "How We Collect Information about You".

In connection with use of our Services or Third-Party Mobile Applications, in addition to information on device type, mobile carrier, IP address, platform version, and geo-location, as applicable, we may also collect navigation, interaction and engagement information regarding Green Horse Games Users.

How We Collect Information about You

When you play one of our games, Green Horse Games collects and stores certain information that you provide directly or through the SNS or other third party website that is offering our game(s). To provide a richer game play and social experience, Green Horse Games also collects information about your play and interaction with other players and the Service. The bulk of this information is collected and stored through the use of Log Files, which are files on our web servers that record actions taken on our games and websites.

You may be able to take part in certain activities on our websites or games that give you the opportunity to communicate or share information not just with Green Horse Games, but also with other users of our Service. These include:

- participating in player forums and message boards
- posting public comments to other users' profiles or gameboards
- sending private messages or invitations to other users, through Facebook, directly on our websites or to their email accounts
- chat with other users

We may record and store archives of these communications on Green Horse Games' servers to protect the safety and well being of our users and Green Horse Games' rights and property in connection with the service. You acknowledge and consent to the recording and storage of such communications for these purposes.

Related Technologies

When you use our Services or Third-Party Mobile Applications, our servers automatically record information that your browser or the applicable Service or Third-Party Mobile Application sends ("Log Data"). This Log Data may include information such as your computer's or mobile device's IP address, browser type, language, Internet Service Provider (ISP), referring and exit pages, time spent, information searched for, time and date stamp, clickstream data and other statistics. We use this information to monitor, analyze and understand trends, for technical administration of Services and Third-Party Mobile Applications, and to gather demographic information about our Green Horse Games User base as a whole. We, and Third Party Publishers may use this information for product and services improvements, and in marketing and advertising services.

BY CLICKING ON THE "SIGN UP" BUTTON, WHERE APPLICABLE, OR OTHERWISE BY ACCESSING OR USING OUR SERVICES YOU ARE

CONSENTING TO THE USE OF COOKIES AND OTHER TRACKING TECHNOLOGIES ON YOUR DEVICE.

Disclosures Within Green Horse Games Services

As a user, you may create your own profile, connect with other Green Horse Games Users of Services, send messages and transmit information through various channels. Please remember that any communications you have via our Services, depending on, for example, the functionality of any Green Horse Games Application or Third-Party Mobile Application connected to our Services, may reveal your screen name and the content of your communications, making this information publicly available to other Green Horse Games Users. Green Horse Games is not responsible for the activities of other Green Horse Games Users or other third parties with whom you choose to provide your Personal Information or otherwise interact.

How we use your Information

We may use your information that we collect in any of the following ways:

1. To create your game accounts and allow you to play our games
2. To enable Users to communicate with other Green Horse Games users
3. To prevent fraud, potential illegal activity and to enforce our Terms of Service
4. To provide technical support and respond to your inquiries
5. To deliver and target advertising to you
6. To identify other Users for you to connect with
7. To improve our Games and Services and create a better experience for Green Horse Games Users
8. To notify you of new Game updates
9. To customize your User experience and solicit feedback to improve Green Horse Games Services
10. To inform you about new products and Services

How we share your Information

With Third Parties and Industry Analysis

In addition to sharing aggregated Non-Identifying Information with Third Party Publishers, we may also share aggregated Non-Identifying Information with advertisers and ad networks ("Advertising Entities") with whom we have strategic relationships. Unless you specifically opt in to share your Personal Information, the information that we share with these third parties will only be used in the form of Non-Identifying Information to support user trend analyses and demographic

profiling. Some Third Party Publishers and Advertising Entities also act as Service Providers (defined below) to us, so in those cases we will share your information as described below.

With Preferred Partners

We may share your username, email address and Device ID (collectively, "Specific Shared Data") with certain of our Third Party Publishers and other business partners ("Preferred Partners") for those parties to assist us with providing you with the aspect of the Services for which you provided such Specific Shared Data to us, and to use such Specific Shared Data to provide you with information and marketing materials about Third Party Mobile Applications and other products and services in order, for example, to further enhance your use of our Services and to augment your gaming experience generally. In addition, in the event of a user inquiry concerning Third Party Publishers or Third Party Applications, we may send Specific Shared Data as well as the inquiry to the Third Party Publisher to address the inquiry.

We only share such information with Preferred Partners pursuant to an agreement by which the Preferred Partner is under obligations not to disclose or use it for any other purpose. You may contact us by any of the means provided in the "Contacting Us" section below to request not to have such information provided to Preferred Partners, understanding, however, that if such information is not shared with Preferred Partners it may affect your ability to use or access portions of the Services.

Some Preferred Partners also act as Service Providers (defined below) to us, and in those cases we may also share Personal Information and Non-Identifying Information as described below.

With our Service Providers

Disclosure of your Personal Information and Non-Identifying Information may also occur where we engage or employ service providers, vendors or other third party entities to facilitate provision of our Services (each a "Service Provider") (e.g., without limitation, improvement of our Services' features, user account authentication, promotion and marketing, administration, analytics, virtual currency transactions, crowd-sourcing, cloud storage and other related services), to provide the Services on our behalf, or to assist us in analyzing how our Services are being used. Our Service Providers may have access to your Personal Information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Under Special Circumstances

At times, we may disclose information about you to law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of Green Horse Games or a third party, to protect the safety of the public or any person or to prevent or stop activity we may consider to be or to pose a risk of being, any illegal, unethical or legally actionable activity. Such disclosures shall only happen with a written request by the agency for the requested information.

Under another special set of circumstances, for example, in connection with a merger, acquisition, reorganization or sale of assets, or in the event of bankruptcy, we may sell, transfer or otherwise share some or all of Green Horse Games assets, including your Personal Information.

Our Policy Toward Children

Our Services are not intended for children under the age of 13 ("children") and we do not knowingly collect any Personal Information from children. If we discover that we have inadvertently collected Personal Information from children, we will take all reasonable measures to erase such information from our systems and records as soon as possible. (Please be aware that Green Horse Games may create certain areas on its website and some Games that contain adult or mature content. You must be at least 16 or 18 years of age to access and view such areas or Games. If you are less than the required age for such areas or Games, please do not use them)

If you are a Child, we recommend that you obtain permission from your parents or legal guardian ("Parents") to play our Games. You should also read this Policy with your Parents so they can help you understand anything you may not understand. If you are a Parent and are concerned about your Child's use of our Games or have any questions, you can contact us using the details in section "Introduction".

How we protect your information

Green Horse Games takes your privacy very seriously and employs administrative, physical and electronic measures to safeguard your information from identity theft and unauthorized access. We do not and will not, at any time, request your credit card information, login password or national identification numbers in a non-secure or unsolicited communication.

We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of your unencrypted electronically stored "personal data"

(as defined in applicable state statutes on security breach notification) to you via email or conspicuous posting on the Sites in the most expedient time possible and without unreasonable delay, insofar as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Where we process your personal information

Your Personal Information will be processed by our employees and service providers in the European Economic Area (“EEA”), in Switzerland and Israel, which are both countries which the European Commission has decided offer an adequate level of data protection. Because countries outside of the EEA may have different data protection laws, we take steps to ensure all transfers outside the EEA are protected by adequate safeguards, including the use of standard contractual clauses approved by the European Commission, such as the transfers to our partners in the USA and South Korea.

How long we keep your information for

Your Personal Information or Non-Identifying Information is kept for as long as you are registered or using our Services, and then for up to one year from the date you stop interacting with the games.

When deleting Personal Information or Non-Identifying Information, we will take measures to make the Information irrecoverable or irreproducible, and electronic files which contain Information will be deleted permanently.

How You Can Change Your Information

You may email us at dpo@greenhorsegames.com to request that we delete your Personal Information from our database. We will use commercially reasonable efforts to honor your request. We may retain an archived copy of your records as required by law or for legitimate business purposes. Specific Shared Data cannot be retrieved from Preferred Partners after its disclosure.

Where you share information with other users through the communication channels of our Services, you generally should not expect to have any ability to modify or remove such communications. Nor should you expect us to modify or delete your comments upon your request.

If you participate in a Promotion hosted by us (where you may or may not disclose the information requested), you have the option to opt out at any time from such

participation and the receipt of any related communications. Please follow the unsubscribe instructions provided in the relevant communication.

Information We Receive From an SNS Where You Play Our Games

To manage the information that Green Horse Games receives about you from an SNS where you play our games, you will need to follow the instructions at that site for updating your information and changing your privacy settings. You can manage certain aspects of information collection and use by going to the settings of your device and reviewing the permissions of each application.

Once Green Horse Games receives your information from an SNS, that information is stored and used by Green Horse Games in accordance with this Privacy Policy, and you may access and update that information as described below. Game or other accounts created with Green Horse Games are considered active until we receive a user request to delete them or deactivate them.

Links to Other Websites and Services

If a Green Horse Games User chooses to participate in offer-linked information requests or "clicks on" an advertisement or another third party link, such Green Horse Games User may be directed to that third party's website or service and/or be prompted to provide Personal Information in connection with such activity. The fact that we link to a third party website or service is not an endorsement or representation of our affiliation with that third party, nor is it an endorsement of such third party's privacy or information security policies or practices or their compliance with laws. We do not exercise control over third party websites or services. These other websites or services may place their own cookies or other files on your computer or mobile devices; collect data; or solicit personal information from you. Other websites and services follow different rules regarding the use or disclosure of the personal information you submit to them. You have the responsibility to review the privacy policies and related statements of the other websites and services you use and the terms of the offers in which you participate. You agree that Green Horse Games is not responsible for, nor will it be liable to you or any third party for, your interaction with such third parties or the information requests initiated by such third parties or the subsequent use, treatment or dissemination of the information you voluntarily choose to provide to them.

Language

The controlling language of this Privacy Policy is English; any provided translation of this Privacy Policy is for purposes of convenience only and the English version shall govern to the extent of any inconsistency.

Your rights

To exercise your rights, please contact us at dpo@greenhorsegames.com. These are your rights in the EEA.

- **Access.** You have the right to access Personal Information, and to receive an explanation of how we use it and who we share it with. This right is not absolute. For example, we cannot reveal trade secrets, or give you Personal Information about other individuals.
- **Erasure.** You have the right to request deletion of your Personal Information. We may need to retain some of your Personal Information where there are valid grounds for us to do so under data protection laws. For example, for the defence of legal claims, respect freedom of expression, or where we have an overriding legitimate interest to do so, but we will let you know when this is the case. Note that where the Personal Information is held by a third party data controller, such as an advertising partner or a payment processor, we will use reasonable steps to inform them of your request, but we recommend you contact them directly in accordance with their own privacy policies to ensure your personal data is erased.
- **Objection and withdrawal of consent:** You have the right to (i) withdraw your consent where you previously provided such consent; or (ii) object to our processing of your Personal Information where we process such Personal Information on the basis of our legitimate interests. You may exercise this right as follows:
 - **To stop receiving push notifications:** please change your device or browser settings.
- **Portability.** You have the right to receive a copy of Personal Information we process on the basis of consent or contract in a structured, commonly used and machine-readable format, or to request that such Personal Information is transferred to a third party.
- **Correction.** You have the right to correct any Personal Information held about you that is inaccurate.
- **Restriction.** You have a right in certain circumstances to stop us processing Personal Information other than for storage purposes.

Contacting Green Horse Games

If you have any questions, inquiries, requests or complaints concerning our Privacy Policy or information practices, please contact us at dpo@greenhorsegames.com.

ADVERTISING AND USER ACQUISITION PARTNERS

We use the following user acquisition and advertising partners that are integrated into some or all the Services. Please check the following privacy policies to learn more about their privacy practices, including how you may exercise your data subject rights.

This list was last updated on 2 August 2023.

Advertising partner	Link to Privacy Policy
Facebook	https://www.facebook.com/policy.php
Google Ads	https://support.google.com/adspolicy/answer/6008942?hl=en
Instagram	https://help.instagram.com/519522125107875
TikTok	https://www.tiktok.com/legal/privacy-policy-eea
Twitter	https://twitter.com/en/privacy
Unity Ads	https://unity3d.com/legal/privacy-policy