

INTRODUCTION

We at Frame Break AB, a Swedish corporation with registered address at Box 133, 541 23 Skövde, Sweden ("Frame Break") respect your privacy and therefore provide you with this Privacy Policy to inform you about what data we collect and how it is used.

Regarding Personal Data collected and processed under this Privacy Policy, Frame Break is the **Controller**. The purpose of this Privacy Policy is to explain how we collect, store, use, transfer or disclose your Personal Data. Personal Data means any information that can identify you, directly or indirectly, such as for example your name, location data or online identifiers.

This Privacy Policy applies to the Lightyear Frontier, a farming adventure videogame we at Frame Break provide you as the user with as well as to any related services such as specific websites or other services (the game, websites and related services herein after referred to as "**Properties**"). We may display advertisements from other companies and other content that links to websites provided by other companies in the Properties. We at Frame Break cannot control or be held liable for these third parties' privacy practices and content. If you click on any link or advertisement provided by another company, please understand that you are then leaving the Properties and any Personal Data you provide will not be covered by this Policy.

Frame Break reserves the right to change this Privacy Policy at any time by posting an updated version online at <https://framebreak.se> or in or in relation to the Properties. Therefore, please review the Privacy Policy frequently to ensure you are aware of any changes. If we make a substantial change to the Privacy Policy, we will provide you with a notice through the Properties or by email.

This Privacy Policy was last updated on June 9, 2022.

YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

The EU's General Data Protection Regulation ("GDPR") gives you certain rights to your Personal Data. These rights can be found (mainly) in chapter 3 of the GDPR and include:

- **Right of Access** – You have the right to request information concerning if we process your Personal Data and if we do, you have the right to know what kind of Personal Data;
- **Right of Rectification** – You have the right to request that we correct and rectify any inaccurate or incomplete Personal Data concerning you;
- **Right to Erasure** – You have the right to request that we delete your Personal Data. Note that we may retain information needed to resolve disputes, enforce our user agreements, protect our legal rights and comply with technical and legal requirements and constraints related to the security and operation of our Properties;
- **Right to Restriction of Processing** – You have the right to request that we temporarily or permanently cease processing of some or all of your Personal Data;
- **Right to Data Portability** – You have the right to receive a copy of your Personal Data for the purpose of transferring them to another service provider;

- **Right to not be the subject of Automated Decision Making** -- You have the right not to be subject to a decision based solely on automated processing. Including profiling, which produces legal effects on you or otherwise significantly affect you;

- **Right to Withdraw Consent** – You may at any time withdraw your consent to the processing of any Personal Data based on your consent, without it affecting the lawfulness of any processing done before you withdrew your consent;

- **Right to Object** – You have the right to object to our processing of your Personal Data for a certain purpose or to object to your Personal Data being used for direct marketing; and

- **Right to lodge a complaint with a supervisory authority** – If you believe that Frame Break has infringed your rights or otherwise infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular an authority established in your Member State or Country.

Accordingly, we offer transparency and access controls to help users take advantage of those rights, as limited and expected under applicable law:

- Privacy Settings accessed via your account page – allows you to exercise choices about the processing of certain Personal Data.

- Notifications settings accessed via your account page – these settings allow you to choose which marketing communications you receive from us.

If you have any questions about your privacy, your rights, or how to exercise them, please contact us using the information provided to you in the “HOW TO CONTACT US” section of this Privacy Policy.

If you have concerns regarding the processing of your Personal Data, we hope you can work with us to solve them. However, you can also contact the Swedish Authority for Privacy Protection (“IMY”) or your local Data Protection Authority. The Swedish Authority for Privacy Protection can be reached through the following address:

Phone: 08-657 61 00

Mail: Integritetsskyddsmyndigheten, Box 8114, 104 20 Stockholm

Email imy@imy.se

THE DATA WE COLLECT AND USE

Below we have set out which categories of data we collect, a description of that data, the legal basis we are using for collecting that data, and the purpose of collecting the data. If you have objections or further questions regarding e.g. a purpose for a particular processing or would like a more granular description of the data collected, please contact us in accordance with the “contact us” section.

The Personal Data we collect from you

Categories of Personal Data (ex. in parenthesis)	Description	Legal Basis	Purpose
Identity Data (Player ID, display/user name)	Data which is used to directly identify you - names or usernames, titles, avatars.	Necessary for the performance of a contract (Art. 6(1)(b))	The Data is necessary for Frame Break to be able to provide the service.
Contact Data (email address, postal address)	Data stored for us to be able to contact you.	Consent (Art. 6(1)(a)), legitimate interest (Art. 6(1)(f))	In certain circumstances you may provide us with contact information, such as when you wish to contact us via our contact form – please note that we save the contact information you provide in such circumstances, to be able to reply to you. We may also need to contact you for the benefit of your interests, and as such will save your email address for that purpose. We deem such a purpose to constitute a legitimate interest.
Location Data (city, language, country, IP-address)	Data regarding location of the user.	Legitimate interest (Art. 6(1)(f))	We use location data to keep track of which servers globally are being strained, and using that data to improve your experience by addressing e.g. latency/ping issues.
Time Data (time of login, date of transaction, time of profile creation)	Data indicating date/time of use for certain actions.	Necessary for the performance of a contract (Art. 6(1)(b))	Frame Break requires data on time of use etc. to be able to provide users with the expected product/experience.
Technical Data (IP-address, language, operating system)	Data regarding technical information of the device used.	Legitimate interest (Art. 6(1)(f))	We use this data to optimize our services to certain devices – if, for example, a certain hardware model is having continuous issues, this data helps us identify that problem.
Age data	Data used to identify your age, birthday or similar information.	Consent (Art. 6(1)(a)), Legitimate interest (Art. 6(1)(f))	<p>In specific situations, such as you applying for a job with us, we will ask you to provide us with information about your age. Providing such information is optional at such time.</p> <p>Furthermore, we may ask that you provide us with age data to confirm that you are of proper age to access our services, as specified in our Terms of Use, and to ensure that we comply with regulatory demands – ensuring this is within our legitimate interests.</p>
Aggregated, anonymized Data	Data which has been collected and subsequently anonymized for use in aggregated data sets.	Not applicable.	Anonymized Data is not subject to GDPR regulations and as such, it may be freely used. Nevertheless, we wish to inform you that we use anonymized data to better understand customer behaviour and how to improve the Properties.

SHARING YOUR PERSONAL DATA

We share Aggregated Data with third-party partners and service providers. This Aggregated Data does not contain Personal Data and consists of statistics relating to usage of the Properties. We do this to better understand the experience of our users, and how to improve the Properties. Since the aggregated data we collect is anonymized and thus does not contain Personal Data, it is not subject to GDPR regulations.

We sell certain Personal Data such as Identity, Contact, Usage, preference, and Marketing and Communications data to third-party advertisers, to personalize the advertisements you receive, and to help us monetize the Properties. Such third-party advertisers may use that Personal Data for advertisements outside the Properties. Most Personal Data shared is collected via cookies – please visit our Cookie Policy for more information. We only work with actors whom we truly believe respects the security of your personal data and who treat it in accordance with the GDPR or the relevant applicable law. We rely on your consent as a legal basis for selling or otherwise sharing your Personal Data. To the extent we believe it justifiable and reasonable (as a general practice, and in terms of what you as a user can reasonably expect) we share some data on the basis of our legitimate interests. Our legitimate interest in this context consist of wanting to provide you with relevant ads and content which is more helpful to you, as well as the necessity of monetization.

TRANSFERS TO COUNTRIES OUTSIDE THE EU AND EEA

We transfer and share your information to third parties (including service providers operating on our behalf) which are located in countries outside the European Union (“**EU**”) and/or the European Economic Area (“**EEA**”) which may not have the same level of data protection laws as those in the country where you are located. When your data is sent to a country outside the EU/EEA that is not subject to an adequacy decision by the EU Commission, the transfers will only occur if we (or an applicable processor) have implemented what we believe to be appropriate safeguards in accordance with the GDPR, such as EU Commission approved standard contractual clauses, which are deemed to offer sufficient safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals. We do not transfer data outside the EU/EEA unless we judge that your Personal Data enjoys equivalent protection as if in the EU/EEA.

KEEPING YOUR DATA SAFE

We implement the appropriate technical and organizational measures to ensure that your Personal Data is collected, processed and stored as securely as possible. However, there is no such thing as perfect security and complete online or offline security can never be guaranteed, so you should always be careful when sharing your information online.

We have implemented various policies such as encryption, access and retention policies to guard against unauthorized access and unnecessary retention of Personal Data.

DATA RETENTION AND DELETION

We will not retain or keep any Personal Data for longer periods than what is necessary for the purposes outlined in this Privacy Policy. We will delete your Personal Data which we process for the performance of a contract or on the basis of consent, if you terminate your contract with us, withdraw your consent or where you request us to delete your Personal Data in accordance with this Privacy Policy. However, we may still retain information where we have a legitimate interest to use your Personal Data. For example, to resolve disputes, enforce our user agreements such as our Terms of Use, or to comply with legal requirements.

CHILDREN

The Properties are not directed to children under the age of 13. We do not knowingly collect Personal Data from children under 13 years old in the Properties or in connection therewith. If you are under 13 years, please do not use or access the Properties.

We believe it is important to safeguard the privacy of children and encourage parents to regularly monitor their children's use of online activities. If you are a parent and believe that your child under the age of 13 has accessed and/or used the Properties and provided Personal Data to us, please contact us through the mailing address at the end of this Privacy Policy and we will work to delete that account and any such personally identifiable information.

If we learn that we have collected and processed Personal Data of a child under the age of 13 years, we will take reasonable steps to ensure the erasure of the Personal Data from our systems. This may require us to delete the child's account to the Properties.

HOW TO CONTACT US

If you have any questions, complaints or comments regarding how we process your Personal Data or our Privacy Policy, please contact us at:

Frame Break AB

Box 133

541 23 Skövde

Sweden

info@framebreak.se