

ClanPlay – Privacy Policy

Welcome to **ClanPlay**, an instant messaging service that lets you communicate with friends from games you play either privately or in a group. We, at ClanPlay Ltd. (“**ClanPlay**”, “**we**”, “**us**”, “**our**”) respect your privacy.

This Privacy Policy (the “**Policy**”) explains our privacy practices for the service (the “**Service**”) we offer through our mobile app (the “**App**”) and our website www.clan-play.com (the “**Website**”). It describes how we collect personal information, use it and share it and the rights and options available to you with respect to your information.

Providing us with your personal information is a choice you make. We appreciate that and thank you for making this choice. You are not legally obligated to provide us with this information, but we do need it in order to provide you with the Service.

This policy is combined into our [User Agreement](#) (the “**Terms**”), and is a part of them.

In short...

The following key points of the Privacy Policy are only brought for your convenience. They do not substitute the full Policy.

1. **Information we collect.** We collect information you actively provide us (for example, when you register to the Service or sign-up using your Facebook account and the content that you post on the Service). We collect analytical information about your use of the Service (e.g., the frequency and scope of your use of the Service), and information about your device and geo-location.
2. **Content.** Content you communicate through chats may contain your own or others’ personal information, depending on the particulars of the Content. The Content is shared with the chat or feed recipients. We may collect and store the content of those chats as well as ancillary information such as the user whom you chatted with and the time of chat.
3. **Using the information we collect.** We use the information we collect to provide you the Service’s features (e.g., connecting to games linked to the App in order to communicate with players in your clans), and serve you with relevant in-App ads and promoted games targeted to your profile. We also use it to improve and customize the Service and develop new services. We process your personal data for marketing purposes, and you have the right to object at any time to processing your personal data for such marketing.
4. **Sharing the Information We collect.** We may share your information in order to operate, maintain and enhance the Service. For example, we will share such information with third parties you want to interact with through the Service (such as other users of the App and games linked to the App) to facilitate such interaction, and with service providers to serve you with targeted ads and promoted games.
5. **Access to Information.** You may request to access your personal information, or have us update, correct or delete such information, if the applicable law provides you those rights. You may also be entitled to obtain from us a copy of the personal data you provided us.
6. **Aggregated information.** We may use the information we collect from you to create de-identified, statistical or aggregated information, and make it available to others for any purpose.

7. **Retention.** We retain your information for as long as we deem necessary for the purpose it was first obtained. If you withdraw your consent to us processing your data, we will erase your personal data from our systems.
8. **Security.** We implement measures to reduce the risks of damage and unauthorized access or use of information, but they do not provide absolute information security.
9. **Children privacy.** You must be 13 years of age or older in order to use the App. We do not knowingly or intentionally collect information about children who are under 13 years of age.
10. **Changes to the Policy.** We may change this Policy, in which case we will seek your consent to those changes.

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INFORMATION WE COLLECT

Information you actively provide us

Registration. You may register using your email address, your mobile phone number or your Facebook account.

If you choose to register with your Facebook account, you give us access to retrieve your profile information on Facebook. The particular categories of information we retrieve from your Facebook account are the scope of information that Facebook makes available to us by default, according to your privacy settings on Facebook. The information we collect in this manner typically includes your full name, email address, profile picture and other profile information such as date of birth and gender – to the extent you have these in your profile and Facebook gives us access to them.

Content. The content (such as text, images, links and video) that you send, upload or otherwise make available through the Service (“**Content**”) is communicated either through push notifications to the particular users you sent the message to, or with all gamers if it is Content that you post on the ClanPlay feed.

Such Content may contain, or be indicative of, your personal information, depending on the particulars of the Content. **Such Content is not treated as private or confidential and you should not have any expectation of privacy with respect to it.** We may collect and store the content of those chats as well as ancillary information such as the user whom you chatted with and the time of chat.

BECAUSE THE CONTENT YOU UPLOAD MAY HAVE TO DO WITH THE PRIVACY OF OTHERS, YOU MUST LAWFULLY OBTAIN THE CONSENT OF ALL INDIVIDUALS DEPICTED, SHOWN OR REFERRED TO IN THE CONTENT, TO INCLUDE THEM IN THE CONTENT AND TO USE THAT CONTENT FOR THE PURPOSES AND IN THE MANNER CONTEMPLATED BY THE TERMS. CONCERNING MINORS DEPICTED OR SHOWN OR REFERRED TO IN THE CONTENT, YOU MUST LAWFULLY OBTAIN THE CONSENT OF THEIR PARENTS OR LEGAL

GUARDIANS TO INCLUDE THEM IN THE CONTENT AND TO USE THAT CONTENT FOR THE PURPOSES AND IN THE MANNER CONTEMPLATED BY THE TERMS.

IN ANY CASE, USE CAUTION AND COMMON SENSE WHEN YOU UPLOAD CONTENT CONTAINING OR DEPICTING PERSONAL INFORMATION OF YOURSELF OR OTHER INDIVIDUALS. YOU ARE SOLELY RESPONSIBLE FOR ANY CONTENT THAT YOU UPLOAD.

Inquiries. If you contact us for questions or complaints, or for technical support, we will collect the information related to your inquiry. This may include your user ID in the Service, email address and other contact information, depending on the nature of your inquiry.

Information we automatically collect

Geolocation information. We collect your geolocation when you use the App.

Analytic Information. When you access or use the Service, whether as a registered user or not, we use of third party analytics tools to automatically collect information about your use of the Service. This information includes your session durations, the content you accessed on the Service, your interactions and user-interface clicks with respect to such content, referring URLs, the frequency and scope of your use of the Service.

Device information. We may collect information about your personal computer or mobile device, including its model, its operating system, unique device identifiers, browser you use its version and language (i.e. locale) preferences, mobile network information and the Internet Protocol (IP) address through which you accessed the Service.

CHILDREN'S PRIVACY

The Service is not intended for children under the age of 13. We do not knowingly or intentionally collect information about children who are under 13 years of age.

If you are under the age of 13 you may not use the Service in any way.

USE OF COLLECTED INFORMATION

Your consent serves as the legal basis for processing your information. You may withdraw consent at any time, without affecting the lawfulness of data processing we carried out based on your consent before such withdrawal.

We use the information we collect for the following purposes:

- Operating the Service and providing its features and functionalities, that is, connecting to games linked to the App in order to communicate with players in your clans.
- Serving you with relevant in-App ads and promoted games targeted to your profile.
- Sending you updates and other communications related to the Service.
- Improving and customizing the Service and developing new services.
- Helping game developers improve their game's user experience.
- Generating statistical and aggregated information about users of the Services.
- Providing you with support, handling complaints and contacting you when we believe it is necessary.
- Enforcing the Terms and this Policy and preventing misuse of the Services.
- Complying with any applicable law and assisting law enforcement agencies and competent authorities, if we believe it is necessary or justified.
- Taking any action in any case of dispute involving you, with respect or in relation to the App.

SHARING INFORMATION COLLECTED

We may share the information outlined in this Policy, with others, in any of the following instances:

- With third parties you want to interact with (such as other users of the App and games linked to the Service), in order to facilitate your interaction with them through the Service;
- With third party service providers to serve you with targeted ads and promoted games;
- With game developers in order to enhance their services;
- With our contractors and service providers, such as Tune, adX, AppsFlyer and Mixpanel for data analysis and processing, bug reporting and handling, and in order to operate, maintain and enhance the Service;
- If you have breached the Terms, abused your rights to use the Service, or violated any applicable law. Your information may be shared with competent authorities and with any third party, if we believe it is necessary or justified;
- If the operation of the Services is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition);
- We may share personally identifiable information with our corporate group entities, but their use of such information must comply with the Policy.

ACCESSING, UPDATING OR DELETING YOUR PERSONAL INFORMATION AND OBTAINING A COPY OF IT

You may ask to access the personal information about you that is stored in our systems, or have us update, correct or delete such information. You may also be entitled to obtain from us the personal data you provided us (excluding data we obtained from other sources) in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller. If you wish to exercise any of these rights, contact us at: info@clan-play.com.

OBJECTING TO DIRECT MARKETING

Among other things, we process your personal data and profile for marketing purposes. You have the right to object at any time to processing your personal data for such marketing. If you raise such an objection, we will no longer process your personal data for such purposes.

AGGREGATED INFORMATION

We may use the information we collect, as outlined above, to compile anonymized or aggregated information. We may share, sell or otherwise communicate and make available such anonymized or aggregated information to any other third party, at our sole discretion.

Transfer of data outside your territory

We may store and process information in the EU and in other countries such as the United States. We may also process information using cloud services. The laws in those other countries may provide a lesser degree of data protection than the laws of your own country. You agree to the transfer of your information to such other countries for the purpose of processing as described in this Policy, including through cloud services.

INFORMATION SECURITY

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use of information. These measures do not provide absolute information security. Therefore, it is not guaranteed and you cannot expect that the Services will be immune from information security risks.

CALIFORNIA RESIDENTS

The following disclosure is made pursuant to California Online Privacy Act (CA Civil Code § 22575): When you use our Services, other parties, such as Google, may collect personally identifiable information about your activities over time and across different websites or online services.

We do not respond to browsers' "Do Not Track" requests.

EUROPEAN CITIZENS

The following disclosures are made pursuant to the European General Data Protection Regulation (GDPR):

- You have the right to withdraw your consent at any time; and to submit a complaint to the relevant supervisory data protection authority.

- ClanPlay Ltd. is the data controller in respect of the processing activities outlined in this Policy.

DATA RETENTION

We retain personally identifiable information for as long as we deem necessary for the purposes set forth above. We may delete any information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth above.

If you withdraw your consent to us processing your data, we will erase your personal data from our systems (unless the data is required for ClanPlay to establish, exercise or defend against legal claims), and inform other data controllers to which we have disclosed your personal data of the erasure request. Please remember that the Service does not provide back-up services for your Content, your phone book or any other data or information uploaded or used by you.

Please note that uninstalling the App from your device will not cause your personal information to be deleted from our systems or from the Service.

NEWSLETTERS

We only send newsletters to registered users and all newsletters we send contain an “unsubscribe” link.

CHANGES TO THIS PRIVACY POLICY

We may change this Policy, in which case we will seek your consent to those changes. If you do not consent to the amended Policy, we may terminate your account and block your access to, and use of, the Service.

CONTACT US

You may contact us with any questions or comments, at: info@clan-play.com.

Our postal address is:

ClanPlay Ltd.

5 Shenkar st.

Herzliya 4672505

Israel

Effective date of the policy: December 26th, 2016