



Privacy Policy

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This **Privacy Policy** for Aurora Game Studios Ltd. ('**Company**', '**we**', '**us**', or '**our**'), describes how and why we might collect, store, use, and/or share ('**process**') your information when you use our services ('**services**').

Reading this **Privacy Policy** will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at: info@auroragamestudios.co.uk.

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Data Collection

1.1 Information You Disclose To Us

We collect personal information that you voluntarily provide to us when you express an interest in obtaining information about us or our products and Services when you participate in activities on the Services, or otherwise when you contact us.

a. Personal Information Provided by You

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

- Names;
- Contact information, such as email addresses and phone numbers;
- Contact Preferences;
- Financial information, such as debit/credit card numbers;
- Billing addresses;

b. Sensitive Information

We do not process sensitive information.

c. Payment Data

We may collect data necessary to process your payment if you make purchases, such as your payment instrument number, and the security code associated with your payment instrument. All payment data is stored by PayPal. You may find their **Privacy Policy** link(s) here:

<http://paypal.com/uk/webapps/mpp/ua/privacy-full>

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

1.2 Information Collected Automatically

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as:

- Internet Protocol (IP) addresses;
- Web browser type and version;
- Device names,
- Device characteristics;
- Operating systems;

- Language preferences;
- Referring URLs;
- Countries, regions and locations;
- Analytics about how and when you use our Services, and other technical information;

This information is primarily needed to maintain the security and operation of our Services and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

a. Log and Usage Data

Log and usage data are service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).

b. Device Data

We collect device data such as information about your computer, phone, tablet, or other device you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.

c. Location Data

We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt-out, you may not be able to use certain aspects of the Services.

1.3 Information Collected From Other Sources

In order to enhance our ability to provide relevant marketing, offers, and services to you and update our records, we may obtain information about you from other sources, such as:

- Public databases;
- Joint marketing partners;
- Affiliate programs;
- Data providers;

This information includes:

- Contact information such as mailing addresses, email addresses and phone numbers;
- Job titles;
- Intent data (or user behaviour data);
- Internet Protocol (IP) addresses;
- Social media profiles, URLs, and custom profiles;

For purposes of targeted advertising and event promotion.

Data Processing

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent.

2.1 We process your personal information for a variety of reasons, depending on how you interact with our Services, including:

a. Facilitate and Deliver Services

We may process your information to provide you with the requested service.

b. Send Administrative Information

We may process your information to send you details about our products and services, changes to our terms and policies, and other similar information.

c. Protect Vital Interest

We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

Legal Basis for Data Processing

We only process your personal information when we believe it is necessary and we have a valid legal reason (i.e. legal basis) to do so under applicable law, like with your consent, to comply with laws, to provide you with services to enter into or fulfil our contractual obligations, to protect your rights, or to fulfil our legitimate business interests.

3.1 EU or UK

The **General Data Protection Regulation (GDPR)** and **UK GDPR** require us to explain the valid legal bases we rely on in order to process your personal information. As such, we may rely on the following legal bases to process your personal information:

a. Consent

We may process your information if you have given us permission (i.e. consent) to use your personal information for a specific purpose. You can withdraw your consent at any time. Learn more about withdrawing your consent.

b. Performance of Contract

We may process your personal information when we believe it is necessary to fulfil our contractual obligations to you, including providing our Services or at your request prior to entering into a contract with you.

c. Legal Obligation

We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

d. Vital Interest

We may process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party, such as in situations involving potential threats to the safety of any person.

3.2 Canada

We may process your information if you have given us specific permission (i.e. express consent) to use your personal information for a specific purpose, or in situations where your permission can be inferred (i.e. implied consent). You can withdraw your consent at any time.

In some exceptional cases, we may be legally permitted under applicable law to process your information without your consent, including, for example:

- If collection is clearly in the interests of an individual and consent cannot be obtained in a timely way;
- For investigations and fraud detection and prevention;
- For business transactions provided certain conditions are met;
- If it is contained in a witness statement and the collection is necessary to assess, process, or settle an insurance claim;
- For identifying injured, ill, or deceased persons and communicating with next of kin;
- If we have reasonable grounds to believe an individual has been, is, or may be victim of financial abuse;
- If it is reasonable to expect collection and use with consent would compromise the availability or the accuracy of the information and the collection is reasonable for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province;
- If disclosure is required to comply with a subpoena, warrant, court order, or rules of the court relating to the production of records;
- If it was produced by an individual in the course of their employment, business, or profession and the collection is consistent with the purposes for which the information was produced;
- If the collection is solely for journalistic, artistic, or literary purposes;
- If the information is publicly available and is specified by the regulations;

Data Sharing

4.1 We may share information in specific situations described in this section and/or with the following categories of third parties, such as:

- Vendors;
- Consultants;
- Other Third-Party Service Providers;

We may share your data with third-party vendors, service providers, contractors, or agents ('third parties') who perform services for us or on our behalf and require access to such information to do that work. We have contracts in place with our third parties, which are designed to help safeguard your personal information. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will also not share your personal information with any organisation apart from us. They also commit to protect the data they hold on our behalf and to retain it for the period we instruct. The categories of third parties we may share personal information with are as follows:

- Payment processors;
- Data analytics services;

We also may need to share your personal information in the following situations:

a. Business Transfers

We may share or transfer your information in connection with or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4.2 Aurora Game Studios Ltd. has not sold any personal data to third parties for business or commercial purposes. Aurora Game Studios Ltd. will not sell personal data in the future belonging to website visitors, users, and other consumers.

Cookie Policy

This Cookie Policy explains how we use cookies and similar technologies to recognise you when you use our Services (**'Website'**). It explains what these technologies are and why we use them, as well as your rights to control our use of them.

In some cases, we may use cookies to collect personal information, or that becomes personal information if we combine it with other information.

5.1 Purpose

Cookies are small data files that are placed on your computer or mobile device when you visit a Website.

a. First-Party Cookies

Cookies set by the Website owner that enable:

- Website optimisation;
- Reporting information;

b. Third-Party Cookies

Cookies set by parties other than the Website owner that enable third-party features or functionality to be provided on or through the website, such as:

- Advertising;
- Interactive content;
- Analytics;

The parties that set these third-party cookies can recognise your computer both when it visits the Website in question and when it visits certain other websites.

5.2 Usage

We use first and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Website to operate, and we refer to these as 'essential' or 'strictly necessary' cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our online properties. Third parties serve cookies through our Website for advertising, analytics, and other purposes. This is described in more detail below.

5.3 Your Rights

You have the right to decide whether to accept or reject cookies. You can exercise your cookie rights by setting your preferences in a 'Cookie Consent Manager'. The Cookie Consent Manager allows you to select which categories of cookies you accept or reject. Essential cookies cannot be rejected as they are strictly necessary to provide you with services.

The Cookie Consent Manager can be found in the notification banner and on our Website. If you choose to reject cookies, you may still use our Website though your access to some functionality and areas of our Website may be restricted. You may also set or amend your web browser controls to accept or refuse cookies.

The means by which you can refuse cookies through your web browser controls vary from browser to browser, you should visit your browser's help menu for more information.

5.4 Other Tracking Technologies

Cookies are not the only way to recognise or track visitors to a Website. We may use other, similar technologies from time to time, like web beacons, such as tracking pixels and clear gifs. These are tiny graphics files that contain a unique identifier that enables us to recognise when someone has visited our Website or opened an email including them. This allows us to:

- Monitor traffic patterns of users between pages within the Website;
- Deliver and communicate with cookies;
- Understand whether Users have opened the website from an online advertisement displayed on a third-party website;
- Improve site performance;
- Measure the success of marketing campaigns;

In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

5.5 Flash Cookies and Local Shared Objects

Websites may also use 'Flash Cookies' (**Local Shared Objects** or '**LSOS**') to collect and store information about your use of our Services, fraud prevention, and other site operations.

If you do not want Flash Cookies stored on your computer, you can adjust the settings of your Flash player to block Flash Cookies storage using the tools contained in the Website Storage Settings Panel. You can also control Flash Cookies by going to the Global Storage Settings Panel and following the instructions listed.

Please note that setting the Flash Player to restrict or limit acceptance of Flash Cookies may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our services or online content.

5.6 Targeted Advertising

Third parties may serve cookies on your computer or mobile device to serve advertising through our Website. These companies may use

information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. They can accomplish this by using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify your name, contact details, or other details that directly identify you unless you choose to provide these.

5.7 Updating This Cookie Policy

We may update this Cookie Policy from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal, or regulatory reasons. Please therefore revisit this **Cookie Policy** regularly to stay informed about our use of cookies and related technologies.

The date at the top of this **Privacy Policy** indicates when it was last updated.

Data Retention

We keep your information for as long as necessary to fulfil the purposes outlined in this **Privacy Policy** unless otherwise required by law.

6.1 We will only keep your personal information for as long as it is necessary for the purposes set out in this **Privacy Policy** unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Data Security

We aim to protect your personal information through a system of organisational and technical security measures.

7.1 We have implemented appropriate and reasonable technical and organisational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

Data From Minors

We do not knowingly collect data from or market to children under 18.

8.1 We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records.

Your Privacy Rights

In some regions, such as the **European Economic Area (EEA)**, **United Kingdom (UK)**, and **Canada**, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.

9.1 Rights in Regions

In some regions (like the EEA, UK, and Canada), you have certain rights under applicable data protection laws. These may include the right to:

- a. Request access and obtain a copy of your personal information;
- b. Request rectification or erasure;
- c. Restrict the processing of your personal information;
- d. In certain circumstances, you may also have the right to object to the processing of your personal information, If applicable, to data portability. You can make such a request by contacting us at: info@auroragamestudios.co.uk

We will consider and act upon any request in accordance with applicable data protection laws. If you believe we are unlawfully processing your personal information:

a. EEA or UK

You have the right to complain to your **Member State Data Protection Authority** or **UK Data Protection Authority**.

b. Switzerland

You may contact the **Federal Data Protection and Information Commissioner**.

c. California

You may request from us, once a year and free of charge, information about the personal information (if any) we disclosed to third parties for direct marketing purposes, and the information of all third parties with which we shared information in the immediately preceding calendar year, as per **Section 1798.83** of the **California Civil Code**.

9.2 Withdraw Consent

If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us at:

info@auroragamestudios.co.uk

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

9.3 Cookies and Similar Technologies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. You may also opt out of interest-based advertising by advertisers on our Services.

Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('**DNT**') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected.

10.1 At this stage no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this **Privacy Policy**.

Updating This Policy

11.1 We may update this **Privacy Policy** from time to time. The updated version will be indicated by an updated 'revised' date and the updated version will be effective as soon as it is accessible. If we make material changes to this **Privacy Policy**, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this **Privacy Policy** frequently to be informed of how we are protecting your information.

Review Collected Data

12.1 Based on the applicable laws of your country, you may have the right to:

- Request access to information;
- Update information;
- Delete information;

To request to review, update, or delete your personal information, please contact us using the information below.

Contact Us

If you have questions or comments about this notice, you may email us at info@auroragamestudios.co.uk