

Privacy Policy

Crossword & Sudoku LTD Privacy Policy

This is the Privacy Policy (hereafter the "Policy") of Crossword & Sudoku LTD (hereafter "The Company", "we" or "us"), a company incorporated in Cyprus. Company registration number HE406054. Contact information info@kryss.app

Crossword & Sudoku LTD respect the privacy rights of our users and are committed to protect the information collected through the "**Kryss**" app (together "Services"). Crossword & Sudoku LTD has adopted this privacy policy ("Privacy Policy") to explain how we collect, store, and use the information collected in connection with our Services. Should you have any questions relating to this Privacy Policy, please contact us at info@kryss.app

BY DOWNLOADING, INSTALLING, USING, REGISTERING TO OR OTHERWISE ACCESSING THE SERVICES OF OUR SERVICE, YOU ARE BOUND BY THIS POLICY IN RESPECT OF THE INFORMATION COLLECTED ABOUT YOU. YOU GIVE AN EXPLICIT AND INFORMED CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA IN ACCORDANCE WITH THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT INSTALL, USE, REGISTER TO OR OTHERWISE ACCESS THE SERVICES.

Crossword & Sudoku LTD reserves the right to modify this Privacy Policy at reasonable times, so please review it frequently. Your continued use of our Services will signify your acceptance of the changes to this Privacy Policy. If we make material changes in the Policy we will notify you prior to such change. If you do not want to consent to the changes in the Policy you should stop using the Game.

if you sign into one of the Games through a social network Crossword & Sudoku LTD may be able to access certain information about you through that Social Network. For example on Facebook, your Facebook ID, information relating to your friends, profile picture, gender, language, geo-location or the device you are using. We will only access information which you have agreed to make available as part of your membership of such social networks.

Remember you can change what information Crossword & Sudoku LTD can access by changing your privacy features on your social networks;

For purposes of this Privacy Policy, "non-personal data" means information that does not directly identify you. Additionally, non-personal data means "aggregate" and "de-personalized" information, which is data Crossword & Sudoku LTD collects about the use of our Services, from which any personally identifiable data has been removed. Crossword & Sudoku LTD may use tools or third party analytical software to automatically collect and use certain non-personal data that does not directly enable Crossword & Sudoku LTD to identify you. The types of non-personal data we may collect and use include, but are not limited to: (i) device software platform and firmware; (ii) mobile phone carrier; (iii) geographical data such as zip code, area code and location; (iv) game score and achievements; (v) other non-personal data as reasonably required by Crossword

& Sudoku LTD to enhance the Services. Crossword & Sudoku LTD may use and disclose to our partners and contractors the collected non-personal data for purposes of analyzing usage of the Services, advertisement serving, managing and providing the Services and to further develop the Services and other Crossword & Sudoku LTD services and products. You recognize and agree that the analytics companies utilized by Crossword & Sudoku LTD may combine the information collected with other information they have independently collected from other services or products relating to your activities. These companies collect and use information under their own privacy policies. Below is a list of services we use, if you want to check up on their Privacy Policies:

- GameAnalytics – <https://gameanalytics.com/privacy>
- APPODEAL - <https://www.appodeal.com/privacy-policy>
- Firebase - <https://www.firebase.com/terms/privacy-policy.html>
- Facebook Analytics - <https://www.facebook.com/privacy/explanation>
- GameSparks - <https://www.gamesparks.com/privacy-policy/>
- Hockeyapp.net - <https://privacy.microsoft.com/en-us/PrivacyStatement>
- Admob - <https://policies.google.com/privacy?hl=en>

How we are using these services:

Crossword & Sudoku LTD uses the data we collect to provide you rich, interactive experiences. In particular, we use data to:

Provide our products, which includes updating, securing, and troubleshooting, as well as providing support. It also includes sharing data, when it is required to provide the service or carry out the transactions you request; Improve and develop our products; Personalize our products and make recommendations; and Advertise and market to you, which includes sending promotional communications, targeting advertising, and presenting you relevant offers.

We also use the data to operate our business, which includes analyzing our performance, meeting our legal obligations, developing our workforce, and doing research.

In carrying out these purposes, we combine data we collect from different contexts (for example, from your use of our service, the “Kryss” app) or obtain from third parties to give you a more seamless, consistent, and personalized experience, to make informed business decisions, and for other legitimate purposes.

Information in relation to your purchases within the Games. These are handled through the platform on which you purchased the Game or other payment processors (e.g. the Apple App Store or Google Play). Crossword & Sudoku LTD does not retain any card or payment details. We do keep a record of your purchases and your Unique Device Identifier. In order to let you restore your purchase.

Ad Serving Technology:

Crossword & Sudoku LTD reserves the right to use and disclose the collected non-personal data for purposes of advertisement by Crossword & Sudoku LTD or Crossword & Sudoku LTD’s partners and contractors.

Crossword & Sudoku LTD may employ third party ad serving technologies that use certain methods to collect information as a result of ad serving through Services. Crossword & Sudoku LTD or third parties operating the ad serving technology may use demographic and location information as well as information logged from your hardware or device to ensure that appropriate advertising is presented within the Service. Crossword & Sudoku LTD or third parties may collect and use data for this purpose including, but not limited to IP address (including for purposes of determining your approximate geographic location), UDID, software, applications, hardware, browser information, internet and on-line usage information and in-game information. The foregoing data may be used and disclosed in accordance with this Privacy Policy and the privacy policy of the company providing the ad serving technology. You recognize and agree that the advertising companies who deliver ads

for Crossword & Sudoku LTD may combine the information collected with other information they have independently collected from other services or products. These companies collect and use information under their own privacy policies. These ad serving technologies are integrated into our Services; if you do not want to be subject to this technology, do not use or access Services. Although Crossword & Sudoku LTD takes commercially reasonable steps to instruct such advertising companies to comply with the terms and conditions of this Privacy Policy, Crossword & Sudoku LTD does not have access to or control of third party technologies.

Disclosure and Transfer of Personal Data:

Crossword & Sudoku LTD collects and processes personal data on a voluntary basis and it is not in the business of selling your personal data to third parties. Personal data may, however, occasionally be disclosed in accordance with applicable legislation and this Privacy Policy. Crossword & Sudoku LTD may hire agents and contractors to collect and process personal data on Crossword & Sudoku LTD's behalf and in such cases such agents and contractors will be instructed to comply with our Privacy Policy and to use personal data only for the purposes for which the third party has been engaged by Crossword & Sudoku LTD. These agents and contractors may not use your personal data for their own marketing purposes. Crossword & Sudoku LTD may use third party service providers such as credit card processors, e-mail service providers, data analyzers and business intelligence providers. Crossword & Sudoku LTD has the right to share your personal data as necessary for the aforementioned third parties to provide their services for Crossword & Sudoku LTD. Crossword & Sudoku LTD is not liable for the acts and omissions of these third parties, except as provided by mandatory law. Crossword & Sudoku LTD may disclose your personal data to third parties as required by law enforcement or other government officials in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal or may expose you or Crossword & Sudoku LTD to legal liability. Crossword & Sudoku LTD may also disclose your personal data to third parties when Crossword & Sudoku LTD has a reason to believe that a disclosure is necessary to address potential or actual injury or interference with Crossword & Sudoku LTD's rights, property, operations, users or others who may be harmed or may suffer loss or damage.

Data Retention and Correctness:

Crossword & Sudoku LTD retains the data collected pursuant to this Privacy Policy for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Thereafter if the collected data is no longer needed for purposes specified in this Privacy Policy, Crossword & Sudoku LTD deletes all data in its possession. Crossword & Sudoku LTD does not verify the correctness of personal data.

You are at all times entitled to require the deletion of your personal data by sending an email to info@kryss.app If your account is terminated, either by you or by Crossword & Sudoku LTD, your personal data will be deleted.

If your account is and remains inactive for a continued period of 5 years, Crossword & Sudoku LTD will delete your personal data as well as terminate your account.

Our policy towards children under 13:

If you are under 13 years of age or a minor in your country of residence, you need your legal guardian's permission to use or access the Games. Crossword & Sudoku LTD Games are intended for audiences aged 13 and above. However, the content of the Games has been rated by Apple as being acceptable for ages 4 and above. Crossword & Sudoku LTD does not request, seek or track the age of its players and so any individual who has access to a device of any age may play our game and, if unsupervised, make purchases without the device owner's permission. If as a parent or guardian of an under 13 or a minor, you have any concerns about our Policy or you have experienced issues with purchases been made using your device without your permission please contact our customer support at info@kryss.app. Please note that it is the

platform providers (e.g. the Apple App Store, Google Play etc.) not Crossword & Sudoku LTD who control the payment process for in app purchases. Thus, any queries or application for refunds should be made directly to the platform provider. However, should you wish to contact us we would be more than happy to discuss any query you have with you. Information on how to complain about purchases can normally be found within invoices from platform providers.

You have the right to request a copy of the personal data that Crossword & Sudoku LTD processes about you and, where necessary, to rectify, block or erase any such personal data which is incorrect or incomplete. You can exercise this right free of charge, once per year, by sending a signed written request to Crossword & Sudoku LTD. Adresse: Glastonos 12-14, 8046 Paphos, Cyprus

Safeguards:

Crossword & Sudoku LTD follows generally accepted industry standards and maintains reasonable safeguards to attempt to ensure the security, integrity and privacy of the information in Crossword & Sudoku LTD's possession. Only those persons with a need to process your personal data in connection with the fulfillment of their tasks in accordance with the purposes of this Privacy Policy and for the purposes of performing technical maintenance, have access to your personal data in Crossword & Sudoku LTD's possession. Personal data collected by Crossword & Sudoku LTD is stored in secure operating environments that are not available to the public. To prevent unauthorized on-line access to personal data, Crossword & Sudoku LTD maintains personal data behind a firewall-protected server. However, no system can be 100% secure and there is the possibility that despite Crossword & Sudoku LTD's reasonable efforts, there could be unauthorized access to your personal data. By using the Services, you assume this risk.