# **GOG.com Privacy Policy**

Last updated on [Date]

Hello, GOG.com user! This Privacy Policy is where we explain to you how your personal information is collected and stored and what happens to it when you're using GOG.com. Like with our User Agreement **[LINK]**, we've put together both a full text version and a (non legally binding) summary version to make things simple. We'll ask you to agree to this Privacy Policy when you sign up for a GOG account (but it also applies if you just use GOG.com or other GOG services without setting up an account). If you have any queries you can contact us at **[EMAIL**]. Here we go...

### FULL TEXT

# QUICK SUMMARY

### 1. WHO WE ARE

1.1 We are GOG Ltd, a company incorporated in Cyprus with its registered office at 7 Florinis Street, Greg Tower, 6th floor, 1065 Nicosia, Cyprus. GOG Ltd is the data controller under European Union data protection legislation.

#### 2. WHAT THIS PRIVACY POLICY GOVERNS

- 2.1 This Privacy Policy applies to www.GOG.com, your GOG user account, the GOG Downloader, the GOG Galaxy Client for updating games, any games or videos or other content which you purchase or use via GOG.com, the GOG web forums, GOG customer and technical support and any other services we provide to you (we'll just call all this "GOG services" for short).
- 2.2 Specifically, this Privacy Policy governs personal information and non-personal information which we collect from you when you're using GOG services. ("Personal information" means information which, on its own or in combination with other information, can be used to identify you).
- 2.3 We respect your right to privacy and will only process personal information in accordance with applicable legislation in the EU (including in particular the Data Protection and Privacy and Electronic Communications Directives), the USA (including the Children's Online Privacy Protection Act) and elsewhere.

# 3. **PROTECTING CHILDREN**

3.1 We recognise we have a special obligation to protect personal information obtained from children. Legally, children below 13 cannot have a GOG account (but their parents/guardians are welcome to sign up themselves) and we do not and will not knowingly collect personal information from any child under the age of 13 without consent from their parent or guardian. If you are a parent or guardian and are concerned about the transfer of personal information about your child, please contact [EMAIL].

Hello, we're GOG.com and we are based in Europe!

This Privacy Policy explains the different kinds of information we collect from you when you're using GOG services to help make them work. We will comply with applicable privacy laws.

Children below 13 cannot have GOG accounts without parental/guardian involvement and we cannot collect knowingly personal information about them – this is actually a legal requirement.

### 4. WHAT INFORMATION WE COLLECT

- 4.1 When you register a GOG account with us, you will need to provide us: (a) your username; (b) your email address and (c) a password (which is encrypted so that we don't have access to it). In your GOG account settings you can also set your date of birth and your geographical location. This information will be protected by your GOG account password. You are responsible for keeping it safe - please don't share it with anyone.
- 4.2 When you use GOG services we may also collect the following information (how we use it is described later in this document):
  - (a) Technical details about devices which you use to access GOG services, including: Internet and/or network connection (including your IP address); mobile device identifiers; your operating system, browser type or other software; your hardware or details; or other technical details provided by your web browser. This is technical data about our users and their actions and patterns, which does not provide personal information;
  - (b) Details of your use of GOG services including, but not limited to: metrics information about when and how you use GOG services (such as what game(s) you are playing); traffic data; your location; and your purchase history; and
  - (c) Other information required in order to help you with any queries/support you may need assistance with via the GOG forums or customer support.
- 4.3 A quick word about bug reports and crash logs: GOG software will generate and submit to GOG.com bug or crash reports regarding GOG services these reports will not mention your personal information. You can decide whether to send these reports. If you manually submit bug or crash reports to us, or if we contact you asking for feedback regarding crash or bug reports, then we may store them alongside your personal information.

### 5. HOW WE <u>COLLECT</u> INFORMATION FROM YOU

5.1 We may collect and process information about you in the following ways: (a) information you give us via GOG services; (b) information given when you contact us or report a problem with GOG services; and (c) we may also ask you to complete surveys that we use for research purposes, although you don't have to respond to them. We may collect this information via GOG services or trusted third parties connected with us for optional things like surveys or polls.

To register a GOG account, we will ask you for and collect some basic personal information, including username and email. Keep your GOG account password safe.

We may also collect additional information when GOG other you use If GOG services services. crash, we might ask you to crash logs/bug send us reports.

We will collect information through GOG.com or third parties when it comes to optional things like surveys.

### 6. COOKIES

6.1 We also collect information about you via cookies. You can find out more about this in our Cookie Policy here: <u>http://www.gog.com/cookies</u>. The Cookie Policy forms part of this Privacy Policy.

### 7. WHERE WE STORE YOUR INFORMATION

- 7.1 The information we collect from you will normally be stored and processed in the European Economic Area but it may also be transferred to, stored and processed at a destination outside the European Economic Area (including the USA). By submitting your personal information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Privacy Policy.
- 7.2 All information you provide to us is stored on our secure servers. Unfortunately, the transmission of information via the Internet is not completely secure. We will do our best to protect your personal information, but we cannot guarantee 100% security of your data transmitted to our servers; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security to prevent unauthorised access.

# 8. HOW WE <u>USE</u> YOUR INFORMATION

- 8.1 We will use the above information in the following ways:
  - (a) To enable GOG.com functionality that helps you and your friends keep updated about what you're doing within GOG services, e.g. notifying you and your GOG.com friends about who is playing what games.
  - (b) To ensure that GOG services are presented in the most effective manner for you and for your computer or other device from which you access GOG services.
  - (c) To provide you with information, products or services that you request from us and which we feel may interest you - in particular, we may send you newsletters or emails about GOG services (of course, it's optional).
  - (d) To carry out our obligations arising from any contracts between you and us.
  - (e) To allow you to participate in interactive features of GOG services when you choose to do so.
  - (f) To notify you about changes to GOG services.

Read our cookie policy too (link opposite).

Most of the time, we will store your information in Europe, but sometimes we might store it elsewhere if necessary. We will do our best to keep this information secure.

We will use your information to run GOG and keep improving it as well as to communicate with you (e.g. with newsletters or emails).

Sometimes we may have to share anonymised, nonpersonal information like operating system types in order to run GOG services.

- (g) To improve or modify GOG services, for example based on which games you like more and how you play them.
- (h) To calculate conversion rates and other elements of GOG.com performance.
- 8.2 We might share some aggregated and general nonpersonal data on user behaviour (e.g. sales per region) with third party partners who work with us to provide GOG services to you (for example, with games developers/publishers selling games on GOG.com or with payment providers) in order to support, improve or amend GOG services or to help them to improve their products, which you have bought. We may also share non-personal information with data analysis services to help us run GOG.com.

#### HOW <u>YOU USE</u> YOUR INFORMATION

8.3 Please remember that any communications you have via GOG services (e.g. via private messages or the GOG forums or via multiplayer games) may reveal your screen name, other details about you and the content of any communications by you with other users. Also, any information you post publicly using GOG services (e.g. your public profile) will be publicly available to GOG users and others. We are not responsible for your use of otherwise private personal information, which you make available via GOG services, or the activities of other users or other third parties to whom you give or make available your information.

9. THIRD PARTY INFORMATION COLLECTION

9.1 GOG services may, from time to time, contain links to and from the websites or services of third parties (e.g. to games developers whose games are on GOG.com). In addition, third parties (e.g. games publishers) may also collect personally identifiable information (e.g. your email address or name) if you want to access additional game services, but they can collect any such information only after you have been informed of it and consented to it. This may include saving information to your GOG profile in relation to their games (such as, for example, saving game progress). Our Privacy Policy does not extend to these external sites or companies, so please refer directly to their privacy policies.

#### 10. OTHER STUFF

10.1 Please be aware that we are subject to various laws and we may be required to release personal information to comply with law enforcement or other legal requirements. When you're using GOG services you can choose to share your own personal information with others (e.g. in chat) but it's your responsibility.

You may find third party links in GOG, or we might have to direct you to third parties (e.g. publishers) so that you can get access to additional functionalities. They may collect information from you under their own privacy policies.

We might be required to comply with law enforcement requests.

10.2 In the unlikely event of a reorganisation or merger of GOG or GOG accounts we may transfer personally identifiable information to an involved third party who will protect to at least the same level as we do in this privacy policy.

# 11. YOUR RIGHTS

- 11.1 You have the right to ask us not to process your personal information for marketing purposes. You can change your email settings within your GOG account and email communications from GOG to you will contain an opt-out/unsubscribe option.
- 11.2 Depending on where you live, you may have additional privacy rights. For example, in the EU you have the right to access information held about you and you may also contact us to request that we delete your personal information from our system. We will use commercially reasonable efforts to honour your request, but we may decline requests that are unreasonably repetitive, are disproportionate or infringe the privacy of others.
- 11.3 If you have any queries on your rights, contact [EMAIL].

# 12. CHANGES TO THIS PRIVACY POLICY

- 12.1 We may change this Privacy Policy if we think it's necessary, e.g. for legal reasons or to reflect changes in GOG services. If so, we will make the changed Privacy Policy available online at [LINK] and (if you have a GOG account) we'll email you to explain the changes.
- 12.2 Once we change the Privacy Policy, it will become legally binding on you a reasonable period after we post it online (we believe 30 days after we post the change online will normally be a reasonable period of time). During that period, you're welcome to contact us at **[EMAIL]** if you have specific questions about the changes.
- 12.3 If we don't hear from you before the end of that time period, the changes will automatically become binding on you. If you don't agree to those changes (regardless of whether you email us), then unfortunately we must ask you to cease using GOG services. We're sorry we have to say that, but we hope you'll appreciate that for GOG services to work properly we need to have everyone using it under the same rules instead of different people having different rules. That's why we encourage you to get in contact if you have queries.

# 13. USER AGREEMENT

13.1 We'd also like to remind you that our User Agreement has more information about how we operate GOG services and it has a number of sections which apply to this Privacy Policy too. You can read it at [LINK].

Your personal information will be protected the same way as it is right now, regardless of any reorganisations, acquisitions, etc. Fear not!

You have rights about how your personal information is used. Any questions, please contact us at [EMAIL].

We can change this Privacy Policy but if we do we will put the changed version online and normally it will take effect 30 days afterwards.

If you have any problems with our changes, please contact us first.

Just a reminder to check our User Agreement too.