

PRIVACY POLICY

1. Background

- 1.1 We are Triple Topping IVS, company registration number: 38386557 having its registered address at Richard Mortensens Vej 37F, 2300 København S, Denmark ("us", "we", "our" or "TTI"). We have developed the games Welcome To Elk, Ynglet and Spitkiss "the Games".
- 1.2 This document contains a policy statement regarding our processing of personal data as described below and helps you to understand which personal data we collect, why we collect it, and how we use it.
- 1.3 This Privacy Policy only applies to the processing of your personal data by us when we have your consent to send you a newsletter or the processing of your personal data if you buy merchandise from our webshop on tripletopping.com, ynglet.com or welcometoelk.com (the "Websites").

App Store	https://www.apple.com/legal/privacy/en-ww/
Google Play	https://policies.google.com/privacy?hl=en-US
Steam	https://store.steampowered.com/privacy_agreement/
Unity	https://unity3d.com/legal/privacy-policy
Xbox	https://www.xbox.com/en-US/legal/thirdpartydatasharing
Google Stadia	https://stadia.google.com/privacy

- 1.4 Despite the fact that we have developed the Games, all user registration and the processing of personal data thereof takes place through the third parties in the table below (the "Platforms"):
- 1.4.1 You understand and agree that the relevant privacy policies and terms and conditions of these Platforms shall apply in respect of any personal data you have provided the Platforms.

2. Children Under the Age of 13

- 2.1 We will not knowingly collect personally identifiable personal data from any person under the age of 13. We encourage parents to instruct their children never to give out personal data when online. Parents who are concerned

about the transfer of personal data from their children may contact us using the contact information in clause 9.1.

3. Personal data we process and share

3.1 Personal data is data that may – indirect or direct – refer to you, such as an address, gender, name, e-mail address etc.

3.1.1 Our Games does not require or support the registration of user data or your personal data.

3.1.2 If you have given us your consent to send you **our newsletter**, we will process your name and e-mail address. You can at any time unsubscribe from the newsletter service which you have subscribed either via the link at the bottom of the newsletter or by writing to us at support@tripletopping.com. If you have given your freely consent and subscribed to our newsletter, we will share your name and e-mail address with Mailchimp as we use the services of Mailchimp. Mailchimp is located outside of the EU/EEA, in Atlanta, Georgia, USA. For further information, please contact us.

3.1.3 When you **place an order** with us in one of our Websites, we use your personal data (name, e-mail address and address) to handle your order and payment, including communicating with you about your order. The processing is necessary for the performance of our contract with you to fulfil the transaction. We may share your personal data if necessary to comply with such purpose and there is a legitimate basis for doing so. That means that some of your personal data for use in your delivery is shared with our shipping company. We use external payment services, which will process personal data about you, such as your payment information.

3.1.4 If **you write to our support** at support@tripletopping.com we will process the information you have sent us such as e-mail address and your name. Processing is necessary for the purposes of our legitimate interests to support you with any questions or concerns you may have.

3.1.5 In addition, we may share your personal data if we are obliged to transfer/share your personal data to/with public and legal authorities.

3.1.6 In Discord we have access to a list where we can see the username and a profile picture of the users who are following us. We have a legitimate interest to see our followers and to communicate with them. You can read the privacy policy here: <https://discord.com/privacy>.

4. Non-personal data we collect automatically

4.1 Non-personally identifiable data is every kind of data except for personal data. Under this Privacy Policy non-personally identifiable data includes device, OS, instore (where we can see once you have installed the Games), playtime (where we can see your start- and stop time of the Game), crash messages, and your deletion of the Games ("Usage Information"). We may collect the Usage Information automatically.

4.1.1 We only use this Usage Information to analyze our users' preferences and technical background, so that we can improve our Games permanently and it enables us to make our Games appealing to as many users as possible. **We do not use the information in a manner that would identify any single user.**

5. Transfer of personal data to third countries

5.1 If you have given your consent to subscribe to our newsletter, your name and e-mail address is transferred to Mailchimp, which is located in the USA. **You have explicitly consented to the transfer after you have been informed of the possible risks of the transfer due to the absence of an adequacy decision and appropriate safeguards. You can read their privacy policy here: <https://mailchimp.com/legal/privacy/>**

6. Security

6.1 We have established and will maintain adequate organizational and technical measures in order for your personal data not to be accidentally or illegally deleted, deteriorated or lost, disclosed to unauthorized third parties or in any other way misused or used contrary to the data protection legislation.

6.2 In the event of a security breach where we estimate that there is a high risk that your personal data may be misused, we will, without undue delay, notify you of such security breach. We will also inform you about what we have done to minimize the risk of misuse of your personal data.

7. Erasure of your personal data

7.1 We will erase your personal data when we no longer need it for the required purposes or to comply with specific legislative requirements.

7.2 Your consent for signing up to our newsletter will be retained for as long as we send you newsletters and up to two years after the last e-mail send.

7.3 If you have placed an order with us in one of our webshops, your personal data will be deleted no later than five years after the end of the financial

year in which your last transaction was made, unless we are obliged to a longer retention period to comply with legal requirements.

7.4 If you have communicated with us by e-mail, we will delete the information 30 days after, unless we are obliged to a longer retention period to comply with legal requirements.

8. Changes to Privacy Policy

8.1 This Privacy Policy may be amended from time to time. We will notify you of any changes to our Privacy Policy in the Game.

9. Your rights

9.1 According to the General Data Protection Regulation you have the right to:

9.1.1 Access the personal data about you that we collect and use. You have the right to obtain a copy of your data free of charge. However, we may charge a fee corresponding to administrative costs if further copies of the data are requested, or if the request is unfounded or excessive.

9.1.2 Ask for rectification of incorrect or inaccurate data concerning you, or to have incomplete personal data completed.

9.1.3 Ask that your personal data be erased.

9.1.4 Ask for the restriction of the processing of your data (under certain circumstances)

9.1.5 Port your data

9.1.6 Object to the processing of your data for marketing purposes

9.2 We do not process your personal data. If you want to exercise your rights regarding the processing of the personal data processed by the Platforms, you can contact them.

10. Cookies, pixels and other system technologies

10.1 Our Websites collects information by using technology such as cookies, pixels and tags (on your browser or device). For information about how we use this type of technologies, please see our Cookie Policy (available here [\[insert hyperlink\]](#)).

11. Questions or concerns

- 11.1 You are free to e-mail us directly at support@tripletopping.com with any questions or suggestions. We will do our best to reply to your questions and resolve your concerns.
- 11.2 If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link:
http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.