

CD PROJEKT RED – Gwent – Privacy Policy

Last updated: 29 August 2017

Overview:

1. This document explains what information is collected regarding Gwent.
2. It also explains how we use that information, where we store it and how we protect it.
3. We can share the information with partners for the purpose of providing Gwent.
4. We will not share your information for third party advertising purposes.
5. We explain your rights in relation to the information.

OK, that's done. Hello! This Privacy Policy is where we explain to you how your personal information is collected and stored and what happens to it regarding Gwent. We have put together both a full text version and a (non legally binding) summary version to make things a bit more simple. If you have any queries you can contact us at legal@cdprojektred.com.

FULL TEXT

QUICK SUMMARY

1. WHO WE ARE

1.1 We are CD PROJEKT RED, part of CD Projekt S.A. of ul. Jagiellońska 74, postal code 03-301, Warsaw, Poland. We will further call ourselves "CD PROJEKT RED" as CD PROJEKT S.A. is the legal entity CD PROJEKT RED is part of.

Hello, we're CD PROJEKT RED and we are based in Poland.

2 WHAT THIS PRIVACY POLICY GOVERNS

2.1 This Privacy Policy applies to our video game Gwent plus any and all services related to it including (but not limited to) user accounts, esports tournaments and events, customer and technical support provided by us plus official forums, wikis, blogs and social media services (we will just refer to "Gwent" to cover all these things).

2.2 Specifically, this Privacy Policy governs personal information (or, in the USA, personally identifiable information) and non-personal information (or, in the USA, non-personally identifiable information), which we collect from you when you are using Gwent. ("Personal information" basically 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, the USA and elsewhere.

2.4 For personal information contained in this Privacy Policy which is used by CD PROJEKT RED in connection with Gwent, CD PROJEKT RED is the data controller under European Union data protection legislation. For personal information contained in this Privacy Policy which is used by our partners (such as GOG) in connection with Gwent or other products/services, then the relevant partner(s) will be the data controller under European Union data protection legislation.

This Privacy Policy explains the different kinds of information we collect from you when you're using Gwent. We will comply with applicable privacy laws.

3 PROTECTING INFORMATION OBTAINED FROM CHILDREN

3.1 We recognise we have a special obligation to protect personal information obtained from children. 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 legal@cdprojektred.com.

We cannot and will not collect personal information about children below 13 without parental/guardian involvement – this is actually a legal requirement.

4 WHAT INFORMATION IS COVERED?

4.1 When you sign up for, download, use or play Gwent or are involved in Gwent esports events (such as the Gwent Masters tournaments) then certain information will be collected either by us or by our partners including our sister company GOG (which assisted us in developing Gwent and helped us in particular with online aspects of Gwent like multiplayer functionality and servers). This information may include:

- Your name;
- Your date of birth;
- Your email address;
- Any user name used to identify yourself;
- Details of your digital platform account (such as a GOG account);
- Information and other documents which you supply to us in connection with Gwent esports tournaments and events (such as bank account details, if you participate in and win a Gwent tournament);
- Any other information which you supply us via our services;
- Technical details about any device which you use to access our services, including: Internet and/or network connection (including IP address); any mobile device identifier; your operating system, browser type or other software; or your hardware or other technical details. This is technical data about our users and their actions and patterns which does not provide personal information;
- Details of your use of our services including, but not limited to: metrics information about when and how you use the services; traffic data; and your geographical location data;
- If/when we decide to deploy social networking features in Gwent, and if you link our services to a social networking account(s), then we may collect details about your use of social networking account(s) and our services). This may potentially include certain information from (for example) Facebook or other social networks (including access to your name, location, gender, birth date, email address and friends list as well as aggregated non-personal analytics data about our users) strictly in accordance with the social network(s)' terms and conditions; and
- Other information required in order to help you with any queries or support matters.

INFORMATION ABOUT THE STORAGE OF YOUR PAYMENT DETAILS:

A quick word about payment details (if/when you use them in Gwent): this is a matter for the

relevant platform and payment method/processor. We will not receive or store any of your payment details. If you make in-game purchases within Gwent, then we are notified by the payment processor once a transaction takes place and of course we make sure you receive your in-game purchase, but we will not receive any of your actual payment details

We may collect certain information when you use Gwent (more information opposite).

5 HOW IS INFORMATION COLLECTED FROM YOU?

5.1 Information may be collected or processed regarding you in the following ways: (a) information you give us via Gwent or which you give our partners in connection with Gwent; (b) information given when you contact us or report a problem with Gwent; (c) information we request or you provide to us (including our affiliates, partners and licensors) in connection with Gwent esports tournaments and events; and (d) 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 Gwent or trusted third parties connected with us for optional things like surveys or polls.

We will collect the information ourselves or via third parties when it comes to optional things like surveys.

6 COOKIES

6.1 We and our partners also collect information about you via cookies. You can find out more about our use of cookies in our Cookie Policy here: [link](#). The Cookie Policy forms part of this [Privacy Policy](#).

Read our cookie policy too (link opposite).

7 WHERE WE STORE YOUR INFORMATION

7.1 The information we collect from you will be stored and processed in the European Economic Area. By submitting your personal information, you agree to the 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. Once we have received your information, we will use strict procedures and security to prevent unauthorised access.

7.3 We work hard to protect our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold, however, no website or online service is entirely secure (although we do our best) – so please protect the account information in your possession as well.

We will store your information in Europe. We will do our best to keep this information secure.

No information security system is perfect so be careful.

8 HOW IS YOUR INFORMATION USED?

8.1 Your information may be used in the following ways:

- To ensure that Gwent is presented in the most effective manner for you and for your device from which you access Gwent.
- To provide you with marketing information, products or services that you request from us and

which we feel may interest you – for example, we may send you newsletters or emails about Gwent (of course, it's optional and we will ask you for permission first where required).

- To carry out our obligations arising from any contracts between you and us.
- To allow you to participate in interactive features of Gwent when you choose to do so.
- To allow you to participate in and/or otherwise be involved with Gwent esports tournaments and events and so that we and our affiliates, partners, licensors and authorised third parties (as applicable) can operate or carry out our obligations in connection with such Gwent esports tournaments and events.
- To complete any required anti-money laundering or anti-fraud reviews required by applicable governments or authorities or applicable legal requirements and regulations on CD PROJEKT RED.
- To notify you about changes to Gwent.
- To improve or modify Gwent. To provide, maintain, protect and improve Gwent and to protect CD PROJEKT RED and other Gwent users and as necessary to comply as a service provider with the Digital Millennium Copyright Act or other similar legal obligations around the world.
- To calculate conversion rates and other elements of Gwent performance.

8.2 We might share some aggregated and general non-personal information on user behaviour (e.g. sales per region) with our partners who work with us to provide Gwent to you (for example, with payment providers) in order to support, improve or amend Gwent. We may also share non-personal information with data analysis services to help us run Gwent.

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

Sometimes we may have to share anonymised, non-personal information like operating system types in order to run our services. Fear not, as mentioned it would be anonymised, so you could never be identified.

9. HOW YOU USE YOUR INFORMATION

9.1 Please remember that any communications you have via Gwent may reveal details about you. Also, any information you post publicly will be publicly available to other people. We are not responsible for your use of any otherwise private personal information which you make available, or the activities of other users or other third parties to whom you give or make available your information or content.

You have the option to share your own personal information with others. Be careful about it – it is your responsibility.

10. THIRD PARTY INFORMATION COLLECTION AND EXTERNAL SERVICES

10.1 Gwent may, from time to time, contain or connect you with third party content or services. Our Privacy Policy does not extend to external sites or companies, so please refer directly to their privacy policies.

10.2 Some services may involve interacting with our sister company GOG (remember them from earlier in this privacy policy? See section 7.2 above for more), or potentially other trusted partners of CD PROJEKT RED. For example, in order to play Gwent you will need to create a GOG account and, depending on your device, you may need to install and use GOG Galaxy. In order to do this, we may

need to share some of your personal information with our trusted partner. The shared information would be protected by their Privacy Policy.

You may find third party links in Gwent or we might direct you to third parties. They may collect information from you under their own privacy policies. Make sure to take a look at them.

We provide some services via our sister company GOG (who helped us in developing Gwent)) – we will share some information with them.

11. OTHER STUFF

11.1 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.

11.2 In the unlikely event of a reorganisation or merger of CD PROJEKT RED we may transfer personal information to an involved third party who will protect this to at least the same level as we do in this Privacy Policy.

We might be required to comply with law enforcement requests to release personal information.

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

12. YOUR RIGHTS

12.1 You have the right to ask us not to process your personal information for marketing purposes. You can change your email settings to unsubscribe from email communications.

12.2 Depending on where you live, you may have additional privacy rights. For example, in the EU you have the right to access your personal information we possess; you may have the legal right to contact us to request that we delete your personal information from our system; and you may have the legal right to ask us to rectify/correct your personal information if appropriate. 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. Of course, you will be notified in advance.

12.3 Under California law, California residents who have an established business relationship with us have the right to request certain information with respect to the types of personal information we have shared with third parties for their direct marketing purposes, and the identities of those third parties, within the immediately preceding calendar year, subject to certain exceptions. All requests for such information must be in writing and sent to:

CD Projekt S.A.
ul. Jagiellońska 74
03-301, Warsaw, Poland

This same California law permits us to provide you, in response to your written request, with a cost-free means to choose not to have your information shared rather than providing the above

described information. You may exercise that choice by contacting us at the address above.

12.4 If you would like to exercise any of these rights or have any queries regarding them, contact: legal@cdprojektred.com.

You have rights about how your personal information is used. Any questions, please contact us at legal@cdprojektred.com.

13. CHANGES TO THIS PRIVACY POLICY

13.1 We may change this Privacy Policy if we think it's necessary, e.g. for legal reasons or to reflect changes in our services. If so, we will make the changed Privacy Policy available online and update the "Last Updated" date.

13.2 Once we change the Privacy Policy, it will become legally binding on you 30 days after we post it online. During that period, you're welcome to contact us if you have specific questions about the changes.

13.3 If you do not agree to those changes (regardless of whether you email us), then unfortunately we must ask you to cease using Gwent. We're sorry we have to say that, but we hope you'll appreciate that for our 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.

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. Please feel free to contact us if you have any questions with regards to the changes.

14. USER AGREEMENT

14.1 We'd also like to remind you that our Gwent User Agreement (once activated) will have more information about how we operate Gwent.

Just a reminder about our Gwent User Agreement too.

