

Privacy Policy

Note: Please review this Privacy Policy carefully.

This Privacy Policy explains our lawful basis for processing your Personal Data and includes information on who we are, what information we may collect from you, how we use or store it, the choices you have regarding our use of it, your ability to review and correct it and how to opt out from any of our services and/or from receiving any promotional material.

The data we may collect may be personal data about you or by which you can be identified e.g. your full name, address (email and/or postal), mobile number/MSISDN (mobile station integrated services digital network number) etc. (“**Personal Data**”) as well as other non-personal data for analytical purposes to monitor trends and statistical data, which may include: URL/internet protocol address, mobile device location, browser type, pages of the service accessed, viewed search terms, your online service behaviour e.g. subscriptions, product/service purchases, widget/app downloads, social media sharing, comments, reviews etc.

This Privacy Policy is supplemental to the terms and conditions for our service found at URL: <http://www.gameasy.com/uk/> or <https://play.google.com/store/apps/details?id=com.docomodigital.gameasy.wv> which form an integral part of this Privacy Policy.

Who We Are

Buongiorno UK Limited, trading as “**Gameasy**” (or “**we**” or “**us**” or “**our**”), is a limited liability company registered in England and Wales, with its address at: Buongiorno UK Ltd., PO Box 70730, London EC2P 2LQ, under company number 4101267 (the “**Company**” and/or “**Data Controller**”). The Company provides mobile games apps that are accessible on your mobile device via the internet through our web application or the native application (collectively hereinafter the “**Apps**”), <http://www.gameasy.com/uk/> or <https://play.google.com/store/apps/details?id=com.docomodigital.gameasy.wv> (the “**Service**”).

"**You**" in this Privacy Statement means you as an individual and "**we**", "**us**" or “**our**” in this Privacy Statement means the Company and/or the Data Controller.

Privacy Commitment

We understand and recognise the importance of safeguarding any Personal Data received from our customers, so we have formulated this Privacy Policy to reflect our commitment to maintaining the confidentiality of any Personal Data received from you via your selected Service.

We respect your privacy and we will handle your Personal Data in an ethical manner. We ensure that we are compliant with the privacy and data protection laws in the UK as well as the General Data Protection Regulation (GDPR) (EU) 2016/679 (“**GDPR**”).

Your Consent

In order to provide you with the Service, you hereby agree to us collecting, using and processing your Personal Data or other data you may provide as set out in this Privacy Policy and specifically, by subscribing to the Service, you agree that we may request your mobile phone number/ MSISDN (mobile station integrated services digital network number) from your MNO (mobile network operator) for the purposes of applying the charge(s) to your mobile phone account or providing customer support services relating to the Service.

You may at any time withdraw your consent to us collecting some of the Personal Data or other data you provided but this could limit your access to all or part of the Service.

Lawful Basis for Processing

We process your Personal Data only when we have a lawful basis to do so. Presently, we use the performance of the contract and consent as the lawful basis for processing i.e. in order to deliver the Service to you, to provide

you with customer support services and to enable us to send you commercial e-mails informing you about any special promotions or newly available products/services similar to the ones you already purchased (“**Direct Marketing**”).

In certain cases, we may also process data where a legitimate interest is the basis for processing as provided under the GDPR and UK privacy and data protection laws. In some cases, we may also have a legal obligation to collect Personal Data from you, as explained in more detail below.

How Data is Collected and Used

Every time you visit the Service our system automatically recognises the mobile device type used to communicate with us. Individual users will remain anonymous unless you tell us who you are. We will collect the following information: your mobile phone number/ MSISDN (mobile station integrated services digital network number), technical information, including the type of mobile phone you use, mobile network information, your mobile operating system and the type of mobile browser you use. Before you are able to fully access any of the content, the Apps or use the Service you will be required to subscribe to the Service via the Apps.

We may gather Personal Data to allow us to process your subscription to the Service, process any requests or payments you may make, administer your contract, process refunds, for customer services and communications with you, award prizes, provide marketing or promotional materials and certain data about your visit to the Service may be collected to help us improve the Service quality. We may also collect Personal Data so that you can access the online Service, monitor your usage of our Service and/or participation in online activities including reviews, testimonials or competitions, if any, or for other purposes outlined in this Agreement. We do not seek to collect sensitive data (also known as special categories) through this service or otherwise.

Children and Minors

We do not knowingly collect or solicit Personal Data or other data from children and minors. Anyone under the age of 18 (eighteen) will not be knowingly allowed to register for the Service.

If you are under 18 (eighteen) please do not attempt to register for the Service or any part of it or send any Personal Data or other data to us. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us immediately. In the event that we become aware or informed that we have collected Personal Data from anyone under the age of 18 (eighteen) without verification of parental consent, we will promptly delete such Personal Data from our servers.

Disclosures to Third Parties

We will not rent, sell or share your Personal Data with other organisations or non-affiliated companies for commercial purposes unless you have expressly consented to this. However, by law or for regulatory reasons or at the request of an MNO (mobile network operator), we may have to reveal Personal Data to certain third parties if required to investigate or deal with any complaints relating to you or your use of the Service.

Your Personal Data may be revealed to other businesses within our group of companies and/or to reputable third parties who may help process your subscription to the Service or provide customer support services. If all or part of our business is sold, (whether by sale of shares or assets) or integrated with another business, your Personal Data may be disclosed to our professional advisers and any prospective purchasers and their advisers and will be passed on to the new owners of the business. Following completion of any such sale or transfer your Personal Data shall be disclosed to and transferred to such new owner or third party.

We will not disclose your Personal Data to third parties without first obtaining your consent, save when required by applicable laws and/or regulations or at the request of an MNO (mobile network operator). We confirm that the privacy and data protection practices of our third parties are consistent with ours to ensure maximum protection of your Personal Data. A complete list of the companies responsible for the data processing can be requested directly from the Company.

Applicable Retention Period

The main use and storage periods of your Personal Data for the specific purposes of the processing are the following:

1. For the purposes of performing the contract, your Personal Data will be processed by us as the Data Controller for the entire term of the contract and until the date of expiration of all obligations connected to its performance, and will be stored for 7 (seven) years after that date for any purposes related to compliance with any legal obligations, accounting requirements and to allow the Data Controller to defend its rights;
2. For the purpose of complying with any legal obligations, your Personal Data will be processed and stored by the Company for as long as such processing is required to comply with those legal obligations;
3. With reference to any processing activities carried out for marketing purposes and based on a legitimate interest of the Data Controller or your consent, your Personal Data will be processed for the entire term of the contract and for a further 6-month period after its expiration or termination, unless you object to the processing or revoke your consent.

Data Transfers

Your Personal Data shall principally be processed by the Data Controller within the European Economic Area (the European Union plus, Iceland, Norway and Liechtenstein) (“**EEA**”).

Your Data may be transferred to third parties, located outside of the European Economic Area that have been appointed as Data processor’s in order to manage the customer care service. If this is the case, we are committed to ensuring that appropriate safeguards are put in place in order to make sure that the level of protection of natural persons guaranteed by the GDPR is not undermined. In particular, such transfer may be carried out on the basis of the standard contractual clauses signed between us as the Data Controller and the Data Processor. In any case, you may request further information about the transfer of your Personal Data by contacting the Data Controller or the DPO. You may also require any evidence of the appropriate safeguards adopted.

By using our Service or by interacting with us in the ways described in this Privacy Policy, you consent to the transfer of your information outside the EEA in the circumstances set out in this Privacy Policy. If you do not want your information to be transferred outside the EEA, you should not use our Service.

Your Rights

Whilst we are in possession of your Personal Data, you are entitled (in the circumstances and under the conditions, and subject to the exceptions, set out in applicable law) to:

1. Request access to the Personal Data: this right entitles you to know whether we hold Personal Data about you and, if we do, to obtain information on and a copy of that Personal Data.
2. Object to the Processing of Personal Data: this right entitles you to request that the Data Controller no longer processes Personal Data. You can contact us using the details in the Customer Information section below.
3. Request the erasure of Personal Data: this right entitles you to request the erasure of Personal Data from our records by contacting us using the details in the Customer Information section below;
4. Request portability of Personal Data: this right entitles Customer to receive a copy (in a structured, commonly used and machine-readable format) of Personal Data that administrators have provided to Company, or request Company to transmit such Personal Data to another data controller.
5. Request the restriction of the processing of Personal Data: this right entitles you to request that Company only processes Personal Data in limited circumstances, including with consent.
6. Request portability of Personal Data: this right entitles you to receive a copy (in a structured, commonly used and machine-readable format) of Personal Data that administrators have provided to Company, or request Company to transmit such Personal Data to another data controller.
7. Cancel the Service: you have the right to cancel any of the Service at any time using any of the following ways:
 - a) clicking on unsubscribe option in the account section of our web application <http://www.webappsupport.co.uk> and following the instructions or
 - b) TEXT “**STOP GAMEASY**” to **60201** to unsubscribe or
 - c) by contacting us using the contact details noted at the bottom of this Privacy Policy;

8. Opt-out of Direct Marketing: if you no longer wish to receive any Direct Marketing from us i.e. information on our products and/or service or any special offers TEXT “NO” to **60201** to stop receiving promotional and marketing offers from us;

9. Withdraw Consent: to the extent that the processing of Personal Data is based on consent, you may at any time withdraw your consent to the further collection and processing of your Personal Data in accordance with this Privacy Policy by giving us written notice to our Data Privacy Officer, details can be found below. Upon receipt of the withdrawal notice we shall cease (and cause our third parties to cease) collecting, using or disclosing any Personal Data, as the case may be, unless such collection, use or disclosure, as the case may be, without your consent, is required or authorised under the GDPR, UK privacy and data protection laws or other written law;

10. In the event that we refuse your request under rights of access, we will provide you with a reason as to why. If you have any questions, comments or concerns about how we handle your Personal Data, please contact us directly using the details in the Contact Information section below;

11. Make a complaint: you have a right to make a complaint about how your Personal Data is being processed or how your complaint is being handled by lodging a complaint directly with the Information Commissioner’s Office: <https://ico.org.uk/> and/or our Data Protection Officer (“DPO”) by emailing dpouk@buongiorno.com.

Cookies

Our Service uses ‘cookies’ to distinguish you from other users of our Service. A cookie is a small amount of data or parcels of text that is sent to your browser from a web server and stored on your mobile device’s hard drive, if you consented to this. Generally, a 'cookie' being a file in your web browser enables the website to recognise your mobile device when you visit the website.

Cookies help us to enhance your experience when you access our Service and also allows us to improve it. We may obtain information about your general internet usage by using such cookie files which are stored on the browser of your mobile device type. Cookies contain information that is transferred to your mobile device type.

Cookies enable us to:

- estimate our audience size and usage pattern.
- store information about your preferences, and so allow us to customise our Service according to your individual interests.
- speed up your searches.
- recognise you when you return to our Service.
- provide a more convenient browsing experience for you.

You may refuse to accept all cookies, reject all cookies, or modify your browser to alert you of any new cookies by activating these settings on your browser. However, if you select any of these settings you may be unable to access certain parts of the Service. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you access our Service. Please note that advertisers may also use cookies, over which we have no control.

To reject cookies or alter the access in any way, you can follow the instructions below to do so. Please always check for updated software instruction versions as to how to control cookies.

iPhone

1. Turn on your iPhone
2. Tap on "Settings."
3. Scroll down and select "Safari."
4. Swipe to the bottom and tap on "Clear Cookies."
5. When it asks you to confirm, tap on "Clear Cookies"
6. Delete any saved passwords

Android

1. Turn on your Android
2. Tap on your preferred "Browser."

3. Press the "Menu" button
4. Tap "More" and then "Settings."
5. Select "Privacy Settings" and tap on "Clear All Cookie Data."
6. When it asks you to confirm, click "Yes"

You can also find out more information about cookies by researching the internet or carrying out online searches.

Linking to Third Party Websites

If our Service, the Apps and/or content contain a link to any external websites then these websites are not under our control and we are not responsible for those websites or the conduct of companies who own or control those websites. Your use of those other websites is subject to any terms of use and/or privacy policies on those websites.

Security Statement

The security internal procedures are designed to cover the storage, access and disclosure of your Personal Data. We are committed to online security. We maintain security measures to protect your Personal Data via the Service and to try to prevent unauthorised access of such data that is transmitted to our databases. We cannot however guarantee the security of any data sent over the internet.

The following provisions and arrangements are in place:

- a) We have a management and corporate commitment to data security within the organisation.
- b) All employees are briefed on the importance of personal data and security and confidentiality of data obtained.
- c) Our security measures are reviewed and updated from time to time.

Changes to Our Privacy Policy

From time to time, it may be necessary for us to review and revise our Privacy Policy. We reserve the right to change our Privacy Policy at any time and we will notify you about changes to this Privacy Policy by posting an updated version of the policy on our web application: <http://www.webappsupport.co.uk>. By continuing to access or use the Service after we have posted an updated Privacy Policy or have provided you with notice of any material modifications of the same, you are agreeing to be bound by the modified Privacy Policy. If the modified Privacy Policy is not acceptable to you, your only recourse is to cease using the Service.

To unsubscribe at any time text: • “STOP GAMEASY” to 60201.

Contact Information

If you have any questions concerning this Privacy Policy, please contact us via our address or via email using the details stated below:

The Data Protection Officer (“DPO”) designated by the Data Controller can be contacted at dpouk@buongiorno.com or via registered post at the address 57 – 63 Scrutton St, London, EC2A 4PF.

Complaints

We aim to work with you on any request, complaint or question you have about your Personal Information. However, if you believe we have not adequately resolved a matter, you have the right to complain to the Information Commissioner’s Office (the ‘ICO’). You have a right, at any time, to complain to the ICO. As an independent UK authority, it upholds information rights in the public interest, promotes openness by public bodies and data privacy for individuals. You can visit their website at <https://ico.org.uk>.

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