

BANANA IN THE JUNGLE PRIVACY POLICY

This Privacy Policy is intended to provide you with information on how information and data concerning you (including personal data) is collected and used in connection with you using Banana in the Jungle mobile application (the “**App**”).

1. GENERAL INFORMATION

Within the App you may:

- play the Banana in the Jungle game;
- purchase virtual currency called Gems, which could be traded for special booster helping within gameplay.
- Connect (and register within the game) with personal Facebook account
- Share your game result using Facebook social network

Accessing the App requires accepting this Privacy Policy. Subsequently, whenever you access the App we may be collecting certain information about you, some of which (independently or in connection with other information) may constitute **personal data** under the Regulation 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (“**GDPR**”).

The developer of the App and the controller of your personal data collected when using the App is RTB Marketing & Tech Services Ltd. with its registered seat in Nicosia, Cyprus at Kyriakou Matsi 18, 2nd Floor, Egkomi, Nicosia 2408 (“**we**”).

1. WHAT DATA WE COLLECT

Most of data we collect comes directly from your device when you use the App. This includes:

- IP address,
- technical and statistical information (such as device type, session data, interactions with interface elements, game progress data),
- unique device identification numbers,
- unique advertising ID numbers (Apple Identifier for Advertisers “IDFA” on Apple, and Google Advertising Identity “GAID” on Android).

We allow for **purchase transactions** in the App. However, we do not collect payment information you submit in order to conduct such transactions (such as name and surname, credit/debit card details, authentication data etc.). All such information will be collected by entities responsible for handling those transactions (see below).

1. HOW YOUR DATA IS USED

- We will use your data for the following purposes:

1. assuring proper functionality of the App, in particular properly running the Banana in the Jungle game, including detecting illegal activities and;
 2. remembering your preferences with regards to the App;
 3. conducting analytical operations for technology and product development (e.g. analyzing how you engage in with the App);
 4. marketing (allowing for displaying third parties personalized ads).
- Some of the above information will be collected through software development kits (“**SDKs**”) provided by our partners, namely:
 - Facebook – which allows for connecting with facebook services like FB login or FB share. For more information click [here](#);
 - Appsflyer – which allows for tracking install attribution software. For more information click [here](#);
 - Unity Analytics – which allows for conducting analyses of your behavior when using the App. For more information click [here](#);
 - Unity Ads – which allows for displaying ads. For more information click [here](#);
 - Google Admob – which allows for displaying ads. For more information click [here](#);
 - Chartboost – which allows for displaying ads. For more information click [here](#).
 - **Purchase transactions** you may conduct within the App are handled either by Google Play or App Store. For further information see Google Payments Privacy Notice or Apple Privacy Policy.

- We may also process your personal data to defend our rights and, if required, pursue claims.

1. **LEGAL BASIS FOR PROCESSING OF YOUR PERSONAL DATA**

1. Your data collected for the purposes of assuring proper functionality of the App on the basis of the **necessity for entering or performance of a contract** to which you are subject, when using the App.
2. Your data collected for the purposes of remembering your preferences with regards to the App and conducting analytical operations for technology and product development is processed pursuant to our **legitimate interest** consisting in (1) providing you services tailored to your preferences and (2) constant improvement of our services.
3. Your data collected for the purposes of marketing is processed pursuant to **the consent you give** when accepting this Privacy Policy.
4. Should you need further information concerning the legal basis for collection and use your personal information, please contact us at: piotr.rytel@rtbhouse.com

1. **SHARING YOUR DATA**

We may share your data with the following categories of third parties.

- in order to assure the ongoing operation of the App and its security – with **our subcontractors** such as providers of data centers or IT services;
- for the purposes indicated in Section 3 above – with **our trusted partners** i.e.: Facebook Ireland Ltd., AppsFlyer Ltd., Unity Technologies ApS, Google LLC, Chartboost, Inc. and Apple Inc.

In any case we follow security procedures in particular we make sure they grant an appropriate level of privacy security to your data and process your data only for the purposes referred to above as well as in compliance with this Policy and the applicable laws. To learn more about how our partners use your data please consult their Privacy Policies.

Your personal data may also be disclosed to entities which are authorized by the applicable laws to receive such data, including to the competent law enforcement authorities.

We will not transfer or permit any of your personal data to be transferred to a territory outside of the European Economic Area unless we have taken measures necessary to ensure the transfer is in compliance with applicable laws. Such measures may include (without limitation) transferring the personal data to a recipient in a country that the European Commission has decided provides adequate protection for Personal Data as referred to in Article 45 GDPR or to a recipient in the United States that has certified compliance with the EU-US Privacy Shield framework. Nonetheless, some of your data may be transferred to such countries as part of our partners' activities. For more information, please consult their Privacy Policies.

1. DATA SECURITY MEASURES

We implement technical and organizational measures to ensure a level of security appropriate to address the identified risks, taking into account in particular the scope, context and purposes of processing your personal data. Confidentiality, integrity and availability principles are strictly adhered to.

We store your data in top-tier multi-tenant data centers operated by market leading companies with appropriate data security certifications. The data is replicated over multiple systems to help to protect against accidental destruction or loss and backups of data are performed in regular intervals.

Access to our data processing systems is granted only to members of the staff authorized by the management of the company. We use security mechanisms, file system permissions, application permissions and passwords as well as various two-factor authentication methods to prevent unauthorized access and encrypt data transmission channels.

We have deployed procedures regarding every aspect of processing, carefully select technologies used for processing as well as data recipients and constantly develop the awareness and knowledge about privacy and personal data protection.

1. DATA RETENTION

We will retain personal information concerning you for as long as we have a valid legal basis for processing. When we no longer have a legal basis to process your personal information, we will either delete or anonymize it.

In case of data processing based on our legitimate interest your data will be processed until you object to such processing. Where the data processing is related to responding to your query, we will keep such data for a period needed to deal with a specific query and a reasonable term thereafter, in order to evidence compliance with applicable laws.

1. EXERCISING YOUR PRIVACY RIGHTS

You may opt-out from using advertising IDs in privacy settings on your device.

To the extent provided by the applicable data protection laws, in particular the GDPR, you have the right to:

- access your personal data,
- rectify your personal data,
- request erasure of your personal data,
- object to data processing,
- restrict processing of your personal data,
- receive a copy of your data in a structured, commonly used and machine-readable format or to request transmission of the data to another controller,
- lodge a complaint with a competent supervisory authority,
- withdraw consent for data processing you gave at any time (without affecting the lawfulness of processing based on consent before its withdrawal).

For more detailed information related to your data subject rights please do not hesitate to contact us at: piotr.rytel@rtbhouse.com

1. CHILDREN'S PRIVACY

We do not knowingly collect or solicit any information from anyone under the age of 16. This App is not directed at children under the age of 16. In the event that we learn that we have collected personal information from a child under age 16 without verification of parental consent, we will delete that information as quickly as possible.

1. AMENDMENTS

We keep this privacy policy under regular review to make sure it is up to date and accurate. We will notify about its changes in advance.

1. CONTACT US

If you wish register a complaint regarding the operation of the App, you may do so by writing to us at RTB Marketing & Tech Services Ltd., Kyriakou Matsi 18, 2nd Floor, Egkomi, Nicosia 2408, Cyprus or contact us at: piotr.rytel@rtbhouse.com We shall provide you with our response within **30 days** at the latest in the same form in which a complaint was made.

Last updated: February 6, 2019.