

## Den of Wolves Website

### Privacy Policy

Last Updated: 5 December 2023

#### Welcome to Den of Wolves!

This Privacy Policy explains how 10 Chambers AB (“we”, “us”, “our”) collect, use, disclose, and store your personal data when you visit our website for Den of Wolves (DoW) (“Service”), subscribe to our newsletter or interact with our services, or when you make any other contact with us. As the data controller for the DoW website and game, we are responsible for how we collect and process your personal data. The registered address of 10 Chambers AB is Drottninggatan 95A, 113 60 Stockholm, Sweden.

This Policy also explains your rights in relation to how we process your personal data, including the right to object to certain processing. More information on your rights can be viewed below.

Please do not hesitate to contact us if you have any questions or concerns about this Policy using the contact details provided below.

#### 1. The Types of Personal Information We Use

This section describes the different types of personal information we collect from you (including from third parties) and how we collect it.

##### *Information you provide to us through our services*

- **Contact Information:** we collect your contact details including email address, IP address and country of residence. If you contact us with an inquiry, we collect information regarding the date and time of the inquiry and may request additional information for customer support and feedback.
- **Newsletter Information:** when you sign up for our newsletter or other promotional materials we collect certain data about your subscription with us, including the email address you used to subscribe and the date you started your subscriptions.

##### *Information generated automatically when you use our website or from third parties*

- **Technical and Usage Information** – We automatically collect information about your use of our website including which pages you visit, time spent on each page, what links you click on, which site referred you to the current site, browser and URL type, mobile device ID, ISP ID, device type timestamp, OS version, screen resolution, time-zone, system language, and IP address. We use cookies and other similar technologies to do this, including cookies placed on your device by third parties. For more information on our use of cookies, please see our [Cookies Policy](#). We collect this information through our third party service providers, including from other websites, connected devices, and offline data sources.
- **Marketing and Advertising Information** – When you visit our website, we may receive certain data about you from third parties through cookies, including our advertising and marketing partners, about your online preferences. This information may contain technical identifiers, Cookie IDs, site visit data, and other metadata collected through your use of online products and services. We only collect this data when you consent to share it.

In relation to the information you provide us, the provision is optional, but if it is not provided this may affect your ability to receive certain services or take part in certain activities through our Service where the information is needed for those purposes.

## 2. Children

Children must not use the Website for any purpose, except where their parent or guardian has provided consent (to the extent this option is available in your jurisdiction).

By children, we mean users under the age of 18 years old; or in the case of a region where the minimum age for processing personal information differs, such different age. For users located in certain regions we have listed the relevant minimum age in the table below.

Region in which the user is located	Minimum age of the user
Australia	18
European Economic Area (Germany and France only)	16
Japan	18
Republic of Korea	14
United Kingdom	13
United States	13

We do not knowingly collect personal information from children under these ages for any purpose. If you believe that we have personal information of a child under these ages without parental/guardian consent, or if you are the parent or guardian of the user and wish to withdraw consent, please contact us at [privacy@10chambers.com](mailto:privacy@10chambers.com) and we will delete such information.

## 3. How We Use Your Personal Information

This section provides more detail on the types of personal information we collect from you, and why. For users who live in the United Kingdom, or the European Economic Area (EEA), it also identifies the legal basis under which we process your data.

Personal Information	Purpose of Processing	Legal Basis
<b>Newsletter subscription</b> – We collect and use your email address	We use this information to add you to our newsletter list, communicate with you via email, and send you promotional content about our games through our third party service providers.	Consent
<b>Measure and analyse our website performance</b> – We collect and use technical and usage data.	We use this information to measure and analyse the performance of our website including determining what links and content are popular, troubleshooting and diagnostics, identifying bugs, and providing you feedback on your experience.	It is in our legitimate interest to use this information to measure the performance of our services.

<b>Improve our products and services</b> – We use contact data, and technical and usage data, and advertising and marketing data.	We use this information to improve our products and services, including our website, and to optimise user experience. We also use this information to improve website security, fix glitches and ensure that links and content work properly.	It is in our legitimate interest to use this information to improve our products and services.
<b>Advertising and marketing campaigns</b> – We use technical and usage data, and marketing and advertising data.	We use this information to monitor and measure our advertising campaigns, including the performance and attribution of our ads and content, to build audience segments based on user behaviour to enable personalised communications, provide immersive experiences in relation to our Services, gain insight into user preferences with our games, and better serve our customers.	Consent
<b>Marketing (social media):</b> social media user account information and comments from such accounts on our social media content.	We use this information to centrally manage our social media platforms.	It is in our legitimate interests to use this information to centrally manage all social media platforms from one platform.
<b>Compliance with legal obligations</b> – We may use contact information, financial information, technical and usage information, and advertising and marketing data.	We may use this information to comply with our legal obligations mandated by law in the UK or the EEA.	Compliance with legal obligation

Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals’ interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details at the end of the notice.

#### 4. How We Share Your Personal Information

Our corporate group operates around the world. No matter where our servers are located, we take appropriate measures to safeguard your rights in accordance with this Privacy Policy. Our servers for our Service are in Sweden. We also have support, engineering and other teams who may support our Services including in Sweden and the United States.

Where we transfer your personal data to the United States, we take steps to ensure that your personal data is adequately protected. We rely on standard contractual clauses (SCCs) approved by the

European Commission to do this, as well as adopt additional safeguards. For a copy of these SCCs, please contact us using the details provided below.

Will we share your personal information with third parties. Situations where this occur are:

- **Service providers** including *IT and tech support services* (that host and provide back-end engineering support for our website, process support ticket IDs, run diagnostics, and fix issues on our site), *customer analytics services* (that collect, organise and analyse data, provide data warehousing, analytics, and marketing automation tools, build and target audience segments with personalised communications – including our newsletters - and help us gain insight into user preferences and experience) *social media providers* (that manage our social media platforms and handles), and *marketing and advertising partners* (that provide marketing and advertisements to our users and monitor the success of our ad campaigns) Our service providers process your personal data in accordance with strict terms we set.
- **Regulators, judicial authorities and law enforcement agencies, and other third parties for safety, security, or compliance with the law.** There are circumstances in which we are legally required to disclose information about you to authorities, such as to comply with a legal obligation or processes, enforce our terms, address issues relating to security or fraud, or protect our users. These disclosures may be made with or without your consent, and with or without notice, in compliance with the terms of valid legal process such as a subpoena, court order, or search warrant. We are usually prohibited from notifying you of any such disclosures by the terms of the legal process. We may seek your consent to disclose information in response to a governmental entity's request when that governmental entity has not provided the required subpoena, court order, or search warrant. We may also disclose your information to:
  - enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
  - detect, prevent or otherwise address security, fraud or technical issues; or
  - protect the rights, property or safety of us, our users, a third party or the public as required or permitted by law (exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).
- **A third party that acquires all or substantially all of us or our business.** We may also disclose your information to third parties if we either: (a) sell, transfer, merge, consolidate or re-organise any part(s) of our business, or merge with, acquire or form a joint venture with, any other business, in which case we may disclose your data to any prospective buyer, new owner, or other third party involved in such change to our business; or (b) sell or transfer any of our assets, in which case the information we hold about you may be sold as part of those assets and may be transferred to any prospective buyer, new owner, or other third party involved in such sale or transfer.

## 5. Data Retention

We do not keep your data for longer than is necessary unless we are required to do so under law. For further details on how long we keep your data, please refer to the time periods set out below.

Personal Information	Retention Policy
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Email address	Stored during your use of our Service.
Technical and usage information	Where information has been collected through a cookie or similar technology, we store this data in accordance with our <a href="#">Cookies Policy</a> . For more information, please see the “details” page in the cookie management platform tool on our website.
Marketing and advertising data	
Customer support data	
Newsletter information	Until unsubscribing from the newsletter upon which the information will be deleted within 30 working days or otherwise stored for the lifetime of your use of our Services (i.e. until account deletion in accordance with your request upon which it will be deleted within 30 working days).

If we are required to retain your information beyond the retention periods set out above, for example to comply with applicable laws, we will store it separately from other types of personal information.

## 6. Your Rights

You have certain rights in relation to the personal information we hold about you, depending on where you are located. Some of these only apply in certain circumstances (as set out in more detail below). To exercise any of your rights, please contact us at [privacy@10chambers.com](mailto:privacy@10chambers.com).

### **Access**

You have the right to access personal information we hold about you, how we use it, and who we share it with.

### **Portability**

You have the right to receive a copy of certain personal information we process about you. This comprises any personal information we process on the basis of your consent or pursuant to our contract with you as described above in the section “[How We Use Your Personal Information](#)”. You have the right to receive this information in a structured, commonly used and machine-readable format. You also have the right to request that we transfer that personal information to another party, with certain exceptions. We will provide further information to you about this if you make such a request.

If you wish for us to transfer such personal information to a third party, please ensure you detail that party in your request. Note that we can only do so where it is technically feasible. Please note that we may not be able to provide you with personal information if providing it would interfere with another’s rights (for example, where providing the personal information we hold about you would reveal information about another person or our trade secrets or intellectual property).

### **Correction**

You have the right to correct any of your personal information we hold that is inaccurate.

## ***Erasure***

You can delete or remove certain personal information we hold about you.

We may need to retain personal information if there are valid grounds under data protection laws for us to do so (for example, for the defence of legal claims or freedom of expression) but we will let you know if that is the case.

## ***Restriction of Processing***

You have a right to require us to stop processing the personal information we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the personal information, we may use it again if there are valid grounds under data protection laws for us to do so (for example, for the defence of legal claims or for another's protection). As above, where we agree to stop processing the personal information, we will try to tell any third party to whom we have disclosed the relevant personal information so that they can stop processing it too.

## ***Objection***

You have the right to object to our processing of your personal information under certain conditions, including when we use solely automated decision-making with legal or similarly significant effects. You have the right to object to processing where we rely on legitimate interests and the right to object to direct marketing.

To the extent provided by applicable laws and regulations, you may **withdraw any consent** you previously provided to us for certain processing activities. Where consent is required to process your personal information, if you do not consent to the processing or if you withdraw your consent, we may not be able to deliver the expected service.

You have the right to complain with a supervisory authority. In the UK, the supervisory authority is the Information Commissioner's Office (ICO). A list of supervisory authorities for the EEA can be found [here](#).

## **7. Contact & Complaints**

Any questions, comments and requests regarding this Privacy Policy should be addressed to [privacy@10chambers.com](mailto:privacy@10chambers.com).

**In the event that you wish to make a complaint about how we process your personal information, please contact us in the first instance at [privacy@10chambers.com](mailto:privacy@10chambers.com) and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with the data protection authority in the region in which you live or work where you think we have infringed data protection laws.**

## **8. Changes**

If we make any changes to this Privacy Policy we will post the updated Privacy Policy here. Please check this page frequently to see if there are any updates or changes to this Privacy Policy.