

Privacy Policy

This privacy policy will explain what information we collect online, why we collect it, and the choices we offer to you.

This privacy policy (“Policy”) describes the data practices of Crowbar Collective (“Company”), covering its services under its control, including this website, any products, mobile applications, console or PC applications (collectively “Services”). By using the Services, you are consenting to this Policy and the processing of your data in the manner provided in this Policy. If you do not agree with these terms, please do not use the Services. This Privacy Policy was last updated on **March 24, 2020**

Information we collect

We may collect information about the Services you use and how you use them, such as the selections you make on our Services. We collect PII, DII, and log information about your interactions as described below.

Personally identifiable information (PII) is information that can be used to identify or contact you online or offline, such as your name, address, email, phone number, photos or audio data, and payment information, or data that is linked to such identifiers. The Service may collect PII when it is provided to us, such as when you use our Services, attempt to contact us, submit a resume or job application, or connect with us on social media or one of our partners. For example, you may see a “Log in with...” button, which means we request PII from a partner to streamline the login process. You will likely be presented with a “request for permission” screen by a third party asking to share your ID, profile picture, and other listed information with us.

We may also create or collect device-identifiable information (DII), such as cookies, unique device and advertising identifiers, statistical identifiers, usernames, and similar identifiers that are linkable to a browser or device. From these platforms, we may also receive other information, such as your IP address, user agent, timestamps, precise and imprecise geolocation, sensor data, apps, fonts, battery life information, and screen size.

Our Services also collect information about your interactions, including navigation paths, search queries, crashes, timestamps, purchases, clicks and shares, and referral URLs. We may combine this data with PII and DII. For efficiency’s sake, information about your interactions may be transmitted to our servers while you are not using the app. We may also partner with third parties that collect additional information – please see their privacy policies for more details and see below for your choices regarding these parties.

Categories of PII We Collect Under the California Consumer Privacy Act (CCPA): We have collected the following information from consumers within the past 12 months.

Category Number	Category	Examples
1	Identifiers	Name, alias, address, IP address, online identifier, email address, username, or other similar data
2	Personal Information as defined by California Civil Code §1798.80(e)	Any information that can be associated with a particular individual, username, and email address.

3.	Internet or electronic network activity information	Browsing history, social media data, search history, and gameplay data.
4.	Geolocation Data	Physical location or movements
5.	Inferences drawn from any information described herein to create a profile about a consumer	Profile reflects consumer reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

How we use information we collect

We use the information we collect from our Services to provide, maintain, protect and improve our Services, to develop new Services and offerings, and to protect us and our users.

PII is primarily used for business purposes, such as for sending you occasional newsletters and updates, hiring, responding to inquiries, logins, and providing Services. When you contact us, we may keep a record of your communication as well as the other information to help solve any issues you might be facing. We may use your email address to inform you about our Services, such as letting you know about changes or improvements. Please keep in mind that comments sections, forums, and other similar areas of our Services are public. Any information posted in those areas is viewable and usable by anyone that has access. We also use your PII for the following business purposes:

- A. To meet the reason for which the PII was provided.
- B. To provide you with information or services you request from us.
- C. To improve our website and performance of the contents therein.
- D. To resolve disputes.
- E. Preventing potentially fraudulent, prohibited, or illegal activities.
- F. Enforcing the Terms of Service.
- G. Performing other duties as required by law.

We share PII and DII with companies, outside organizations, and individuals for limited reasons and the following business purposes, outlined below:

- A. With your consent - We will share PII and other data with companies, outside organizations or individuals if we have your consent to do so.
- B. For external processing - We provide PII to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- C. For legal reasons - We will share PII with companies, outside organizations or individuals if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental request, detect, prevent, or otherwise address fraud, security or technical issues or protect against harm to the rights, property or safety of our users or the public as required or permitted by law.
- D. In case of a sale or asset transfer - If we become involved in a merger, acquisition or other transaction involving the sale of some or all of our assets, user information, including PII

collected from you through your use of our Services, could be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you, either through email and/or a prominent notice on the Services.

- E. We may share aggregated information and DII with our partners such as businesses we have a relationship with, advertisers or connected sites. For example, we may share information to show trends about the general use of our services.
- F. With third party developers who use our API to provide you games through our platform.

We disclose your PII for business purposes to the following categories of third-parties:

- A. Our affiliates
- B. Services providers
- C. APIs
- D. Third parties to whom you or your agents authorize use to disclose your PII in connection with the services we provide.

We use DII to operate our Services and manage user sessions, including analyzing usage of our Services, preventing malicious behavioral and fraud, improving the content, to link your identity across devices and browsers in order to provide you with a more seamless experience online, and helping third parties provide relevant advertising and related metrics. We share DII with third parties primarily for advertising and analytics purposes, for external processing, and for security purposes.

Sharing under the CCPA: In the past 12 months, we have shared the following categories of information:

- A. Category 1: Identifiers
- B. Category 2: Personal Information as defined by California Civil Code §1798.80(e)
- C. Category 3: Internet or electronic network activity information

GDPR Classifications

Many types of data we process qualify for multiple legal bases for processing under the General Data Protection Regulation (GDPR). Below is the primary legal basis for each type of data that we process:

We obtain consent for the processing of data necessary for chatrooms and any optional profile information, such as a description, gender, or birthday. Where users log in with social media accounts, those companies have obtained consent on our behalf to use that data as described above. Consent is also obtained to add and engage with friends and other scenarios as appropriate.

We have a legitimate interest in conducting analytics, measurement of usage and conversions, and game telemetrics to improve our services. We and our processors have multiple measures in place to minimize the privacy impact.

We have a legitimate interest in storing users' purchase history for the purpose of providing users help in fixing purchase and payment issues.

We have a legitimate interest in enabling third party ads and data collection on our sites and apps to help provide a more customized ad experience for our users and site visitors. Our reputable partners provide opt outs and numerous other privacy measures to minimize the privacy impact of online ads.

We have a legitimate interest in periodic email and direct marketing, to inform registered users of updates and offers. We make clear disclosures when users sign up and offer opt outs for anyone not interested.

It is contractually necessary to process your username, email, password, cookie data, IP address, game network IDs, game information (including earned quests and favorite games/game shares), and similar information to fulfill our obligations in the terms of service to provide you with high quality games and a social game network from ourselves and our partners.

Third Parties

While we strive to work with reputable companies with good privacy practices, this Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you on the Services. We also do not control the privacy policies and your privacy settings on third-party sites, including social networks. We may use third parties to help offer you more tailored ads and better Services, such as obtaining analytics about the users of our site and to help tailor advertising to your preferences. We also share your data with our game partners to provide you access to more games. For further information, please see the relevant privacy policies for each third party and industry codes of conduct.

Choice

If you wish to cancel your account, you can do so by accessing our platform or contacting us for assistance with the process. Our email is included at the end of this privacy policy.

If you are under 18 years of age, reside in California, and have a registered account with us, you have the right to request removal of unwanted information that you post onto our Services (e.g., comments or a forum) by contacting us at the email at the end of this privacy policy, stating you reside in California. This does not ensure complete or comprehensive removal of the posted content.

Like many other companies, we do not honor DNT flags but instead offer other choices with respect to third parties. Many third parties participate in self-regulation to offer you a choice regarding receiving targeted ads. Please note that you'll still see generic ads after opting out, but they won't be based on your activities online. On the web, you can opt out of participating companies by visiting the following sites:

- <http://optout.networkadvertising.org/>
- <http://optout.aboutads.info/>
- <http://youronlinechoices.eu/>

If you wish to similarly opt out of cross-app advertising on mobile devices, you can enable the Limit Ad Tracking flag on the device. Enabling Limit Ad Tracking sends a flag to third parties that you wish to opt out of targeted advertising on that device, and major mobile platforms require companies to honor this flag. Screenshots on how to find these options on various devices are available here: <http://www.networkadvertising.org/mobile-choices>. To learn how to opt out on other devices such as video game consoles, please visit the platform's privacy policies for more information.

Users subject to the GDPR also have the right to access their data, rectify mistakes, erase their data, restrict certain processing (i.e., opt out), move their data, withdraw consent, and lodge a complaint with a supervisory authority.

Accessing and updating your information

If you wish to access, update, or delete your PII, please reach out to us at Contact@CrowbarCollective.com. We may ask you to verify your identity before we can act on your request. Making a verifiable consumer request does not require that you create an account with us. You must provide us with sufficient information to verify your identity, however we will only use personal information provided in a verifiable consumer request to verify the requestor's identity.

In some cases, we may have to keep that information for legitimate business or legal purposes and therefore will deny your request to delete the information.

Under the CCPA, you have the right to request that we disclose certain information to you about the collection and use of your PII over the previous 12 months. We may ask you to verify your identity before we can act on your request, however upon such verification, we will disclose to you:

- A. The categories of PII collected about you.
- B. The categories of sources for the PII we collect about you.
- C. Our business or commercial purpose for collecting or selling that PII.
- D. The categories of third parties to whom we share that Personal Information.
- E. The specific pieces of Personal Information we collected about you.
- F. If we sold or disclosed your PII for a business purpose, two separate lists disclosing
 - a. Sales identifying the categories that each category of recipient purchased; and
 - b. Disclosures for a business purpose, identifying the categories that each category of recipient obtained.

Non Discrimination under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. To that end, and unless permitted by law, we will not:

- A. Deny you goods or services;
- B. Charge you different prices for goods or services;
- C. Impose penalties;
- D. Provide you with a different level or quality of goods or services; or
- E. Suggest that you may receive a different price or rate for goods or services or a different level of quality of goods or services.

Information security

We work hard to protect our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold and undertake reasonable security measures with appropriate confidentiality, integrity, and availability protections. However, since no software or storage system is 100% secure, we cannot guarantee for the security of your information associated with the Services, or any other service for that matter. You can help protect your account information by using unique and hard-to-guess passwords. To provide users access to their progress and purchases, we retain data for up to 10 years since the date of user's last login.

Children Under 13

We do not knowingly collect information for any child under the age of 13. If you are the parent of a child under the age of 13 and have a concern regarding your child's information on our Services, please contact us at the email provided at the end of this Policy.

Changes

Our Privacy Policy may change from time to time. We will post any Policy changes on this page, including material changes. Please check back periodically to view changes to our privacy policy. Our most recent change focuses on updates for the CCPA.

Questions?

If you have questions or requests regarding our privacy practices, please contact us at Contact@CrowbarCollective.com.