

# PRIVACY POLICY

1. For the Owner of this website and as a publisher of computer games, the protection of Users' personal data is of the utmost importance. The Owner makes every effort to ensure that Users feel secure when entrusting their personal data while using the website and playing computer games.
2. A User is a natural person, a legal person, or an organizational unit without legal personality, to whom the law grants legal capacity, using electronic services available within the website or inside computer games.
3. This Privacy Policy explains the rules and scope of processing the User's personal data, the User's rights, the duties of the Data Controller, and provides information on the use of cookies.
4. The Controller applies state-of-the-art technical measures and organizational solutions to ensure a high level of protection for the processed personal data and to secure it against unauthorized access.

## I. DATA CONTROLLER

The personal data controller is **Frozen Way S.A.** with its registered office at: ul. Armii Krajowej 25, 30-150 Kraków, Poland, entered into the Register of Entrepreneurs of the National Court Register maintained by the District Court for Kraków-Śródmieście in Kraków, XI Commercial Division of the National Court Register under KRS number: 0000691682, NIP: 7010711516 (hereinafter referred to as: the "Owner").

The Controller has not appointed a Data Protection Officer (DPO). In all matters related to the protection of personal data, including the exercise of rights granted to the User under the GDPR, please contact the Controller directly via e-mail at: [contact@frozenway.games](mailto:contact@frozenway.games) or through the online contact form available on the website.

The User has the right to lodge a complaint with the supervisory authority – the President of the Personal Data Protection Office (**ul. Moniuszki 1A, 00-014 Warsaw, Poland**), if they consider that the processing of their personal data violates the provisions of the GDPR.

## II. PURPOSE OF PERSONAL DATA PROCESSING

1. The Controller processes the User's personal data to enable reciprocal communication with the entity.
2. The Controller processes the User's personal data to send the latest news regarding the Company's operations, updates on projects and game releases, as well as significant corporate events (Investor Relations Newsletter), based on freely given consent.

3. The User may also consent to receive information about news and promotions, which will result in the Controller processing personal data to send commercial information regarding, among others, new products or services, promotions, or sales.
4. Personal data is also processed to fulfill legal obligations incumbent on the Data Controller and to perform tasks in the public interest, e.g., for tasks related to security and defense or the storage of tax documentation.
5. Personal data may also be processed for direct marketing of products, securing and pursuing claims, or defending against claims by the User or a third party, as well as for marketing services and products of third parties or own marketing that is not direct marketing.

### III. TYPE OF DATA

1. The Controller processes User personal data necessary for establishing contact, responding to an inquiry, or performing a service. These include, in particular:
  - Name (first name, last name, pseudonym, or all combined) – for personalization of communication;
  - E-mail address – for sending a response;
  - Message content – voluntarily provided by the User in the contact form;
  - Technical data – such as IP address, browser data, and operating system data (collected automatically for statistical purposes and to ensure the security of the service).
2. Providing the data mentioned in point 1 (excluding technical data collected automatically) is voluntary but necessary to use the contact form and receive a response from the Controller.

### IV. PROTECTION OF CHILDREN'S PRIVACY

1. Services provided directly by the Controller, in particular the newsletter and contact forms on the website, are directed to persons who have reached the age of **16**.
2. Regarding computer games published by the Controller:
  - Game age ratings (e.g., PEGI or ESRB) refer to the suitability of game content for a given age group and are not identical to the age required to consent to the processing of personal data under the GDPR;
  - The Controller does not collect personal data directly within the games (subject to Section X regarding Playtests). Age verification processes and the management of minor players' accounts are carried out by external distribution platforms (e.g., Steam, PlayStation, Xbox) in accordance with their own privacy policies and parental control mechanisms.
3. The Controller does not knowingly process personal data of persons under 16 years of age without obtaining the prior consent of their parents or legal guardians. If information is obtained that such data was collected without the required consent, the Controller will take immediate steps to delete it.

## V. LEGAL BASIS FOR PERSONAL DATA PROCESSING

1. Personal data are processed in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council (General Data Protection Regulation), hereinafter referred to as the "GDPR".
2. The Controller processes personal data based on:
  - Art. 6(1)(a) GDPR (Consent) – where the User has consented to a specific purpose, in particular for sending a newsletter or establishing communication via a contact form;
  - Art. 6(1)(b) GDPR – when processing is necessary for the performance of a contract or to take steps prior to entering into a contract;
  - Art. 6(1)(c) GDPR – to fulfill legal obligations incumbent on the Controller;
  - Art. 6(1)(f) GDPR (Legitimate Interest) – among others, for direct marketing of own products, securing and pursuing claims, and defending against claims.
3. Expressing consent to the processing of personal data (where it is the sole basis) is entirely voluntary.
4. The User's data are not used for automated decision-making that could produce legal effects concerning the User or similarly significantly affect them, including not being subject to profiling within the meaning of Art. 22 of the GDPR.

## VI. USER RIGHTS

1. The User may at any time request information from the Controller about the scope of personal data processing.
2. The User may at any time request the correction or rectification of their personal data.
3. The User may at any time withdraw their consent for the processing of their personal data, without giving a reason. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. The request may concern a specific purpose or all purposes based on consent. Withdrawal of consent for all purposes may result in the inability to further provide certain electronic services or contact, unless another legal basis exists for further processing of data.
4. The User may request the immediate deletion of their personal data. The Controller is obliged to delete the data, unless their further processing is necessary to fulfill a legal obligation, for statistical purposes, or for the establishment, exercise, or defense of claims. Deletion of data necessary to provide a service is equivalent to the termination of the provision of that service or deletion of the User's account.
5. The User has the right at any time to object to the processing of their data based on the Controller's legitimate interest. The Controller will stop processing these data, unless they demonstrate the existence of valid, legally justified grounds for processing that are overriding over the interests and rights of the User, or these data are necessary for the Controller to establish, exercise, or defend claims.
6. The User may request restriction of personal data processing, whether for a specified time or without a time limit, but in a specified scope, which the Controller will be obliged to fulfill. This request will not affect the actions already taken.

7. The User may request that the Controller transfer the processed personal data of the User to another entity. For this purpose, they should write a request to the Controller, indicating to which entity (name, address) the User's personal data should be transferred and which specific data the User wishes the Controller to transfer. After the User confirms their wish, the Controller will transfer, in electronic form, to the indicated entity, the User's personal data. Confirmation by the User of the request is necessary due to the security of the User's personal data and obtaining certainty that the request comes from an authorized person.
8. The Controller fulfills the User's request regarding the direct transfer of data to another entity exclusively to the extent that it is technically feasible using commonly used data transmission standards.
9. The Controller informs the User about the actions taken, before the expiry of one month from receiving one of the requests mentioned in the previous points.

## VII. DATA RETENTION PERIOD

1. In principle, personal data are stored only as long as it is necessary to fulfill the contractual or statutory obligations for which they were collected. These data will be deleted immediately when their storage is no longer necessary, for evidence purposes, in accordance with civil law, or in connection with a statutory obligation to store data.
2. Information regarding the contract is stored for evidence purposes for a period of three years, starting from the end of the year in which the commercial relationship with the User ended. Deletion of data will occur after the statutory limitation period for pursuing contractual claims.
3. Furthermore, the Controller may retain archival information regarding concluded transactions, as their storage is related to claims entitled to the User, e.g., under warranty.
4. If no contract has been concluded between the User and the Owner, the User's personal data are stored until the User's account on the website is deleted. Account deletion may occur as a result of a request submitted by the User, withdrawal of consent for personal data processing, or an objection to the processing of the data.

## VIII. ENTRUSTING DATA PROCESSING TO OTHER ENTITIES

1. The Controller may entrust the processing of personal data to entities cooperating with the Controller, to the extent necessary for the implementation of transactions, e.g., for the preparation of ordered goods and delivery of shipments or the transmission of commercial information originating from the Controller (the latter applies to Users who have consented to receive commercial information).
2. The recipients of personal data may include: entities providing hosting and maintenance services for the website, providers of tools for sending newsletters, providers of analytical systems, entities processing payments, and computer game distribution platforms.

3. Apart from the purposes indicated in this Privacy Policy, Users' personal data will not be shared in any way with third parties or transferred to other entities for the purpose of sending marketing materials.
4. Users' personal data are not transferred outside the European Economic Area (EEA), unless it is necessary in connection with the use of services of third parties mentioned in this Policy (such as Steam, Epic Games, Meta Store, Microsoft Store, PlayStation Store) and the use of global analytical tools (e.g., Unity Analytics). In such cases, technical data may be processed by entities based in third countries (e.g., in the United States). The Controller ensures that the transfer of data is based on appropriate legal safeguards provided for in the GDPR, in particular on standard contractual clauses (SCC) approved by the European Commission or decisions establishing an adequate level of protection (e.g., the EU-USA data privacy framework, the so-called Data Privacy Framework). The User has the right to obtain a copy of the safeguards used when transferring data to third countries by contacting the Controller.
5. This Privacy Policy complies with the provisions resulting from Art. 13(1) and (2) of the GDPR.

## IX. COOKIES

1. The website uses cookies or similar technology (hereinafter collectively referred to as: "cookies") to collect information about the User's access to the website (e.g., via computer or smartphone) and their preferences. They are used, among others, for advertising and statistical purposes and to adapt the website to the individual needs of the User.
2. Cookies are pieces of information that contain a unique reference code that the website sends to the User's device to store and sometimes track information regarding the device used. They usually do not allow the identification of the User's person. Their main task is to better adapt the website to the User.
3. Some of the cookies occurring on the website are available only for the duration of a given internet session and expire after closing the browser. Other cookies are used to remember the User who, after returning to the website, is recognized on it. They are then stored for a longer period.
4. The cookies used on this website are:
  - a) ecsi: 1 month;
  - b) cck3: after closing the browser.
5. All cookies occurring on the website are set by the Controller.
6. All cookies used by this website comply with the applicable European Union law.
7. Most Users and some mobile browsers automatically accept cookies. If the User does not change the settings, cookies will be saved in the device's memory.
8. The User can change preferences regarding the acceptance of cookies or change the browser to be able to receive an appropriate notification each time the cookie function is set. To change the cookie acceptance settings, adjust the settings in the browser.
9. It is worth remembering that blocking or deleting cookies may prevent full use of the website.

10. Cookies will be used for necessary session management, including:
  - a) Creating a special login session for the website User, so that the website remembers that the User is logged in, and their requests are delivered in an effective, secure, and consistent manner;
  - b) Recognizing a User who has visited the website before, which allows for the identification of the number of unique users who have used the service and ensures sufficient capacity of the service for the number of new users;
  - c) Recognizing whether a person visiting the website is registered on the website;
  - d) Recording information from the User's device, including: cookies, IP address, and information about the browser used, in order to diagnose problems, administer, and track site usage;
  - e) Customizing elements of the layout, graphic design, or content of the website;
  - f) Collecting statistical information about how the User uses the site, in order to improve the website and determine which areas of the website are most popular for Users.
11. During the first visit to the site, a message regarding cookies is displayed to the user. Using the site after accepting cookies constitutes consent to their use in accordance with this policy.

## X. GENERAL POLICY REGARDING GAMES

In the case of games in which the Controller uses the services of third parties (e.g., Steam, Epic Games, Unity Analytics), data may be processed by these entities on the terms specified in their own privacy policies.

### **House Flipper Pets DLC on Steam, Epic Games, Xbox, PlayStation, and Nintendo Switch:**

The Controller does not collect or store any user data or personal data.

The base version of the game House Flipper by default uses the Unity Analytics system:

<https://docs.unity.com/en-us/analytics>, which can be disabled in the game's main menu.

More information can be obtained via: <https://frozendistrict.com/privacy-policy.html>

### **House Flipper Farm DLC on Steam, Epic Games, Xbox, PlayStation, and Nintendo Switch:**

The Controller does not collect or store any user data or personal data.

The base version of the game House Flipper by default uses the Unity Analytics system:

<https://docs.unity.com/en-us/analytics>, which can be disabled in the game's main menu.

More information can be obtained via: <https://frozendistrict.com/privacy-policy.html>

### **House Flipper Dine Out DLC on Steam, Epic Games, Xbox, PlayStation:**

The Controller does not collect or store any user data or personal data.

The base version of the game House Flipper by default uses the Unity Analytics system:

<https://docs.unity.com/en-us/analytics>, which can be disabled in the game's main menu.

More information can be obtained via: <https://frozendistrict.com/privacy-policy.html>

**House Flipper Party Furniture Pack DLC on Steam, Epic Games, Xbox, PlayStation:**

The Controller does not collect or store any user data or personal data.

The base version of the game House Flipper by default uses the Unity Analytics system:

<https://docs.unity.com/en-us/analytics>, which can be disabled in the game's main menu.

More information can be obtained via: <https://frozendistrict.com/privacy-policy.html>

**House Flipper Pop Art Furniture Pack DLC on Steam, Epic Games, Xbox, PlayStation:**

The Controller does not collect or store any user data or personal data.

The base version of the game House Flipper by default uses the Unity Analytics system:

<https://docs.unity.com/en-us/analytics>, which can be disabled in the game's main menu.

More information can be obtained via: <https://frozendistrict.com/privacy-policy.html>

**House Flipper Luxury DLC on Steam, Epic Games, Xbox, PlayStation:**

The Controller does not collect or store any user data or personal data.

The base version of the game House Flipper by default uses the Unity Analytics system:

<https://docs.unity.com/en-us/analytics>, which can be disabled in the game's main menu.

More information can be obtained via: <https://frozendistrict.com/privacy-policy.html>

**House Flipper VR on Steam, Meta Store, and PlayStation VR:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**House Flipper Pets VR on Steam:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**Builder Simulator on Steam, Xbox, and PlayStation:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at:

<https://livemotiongames.com/kontakt/>

**Builder Simulator VR on Steam, Meta Store:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: <https://epicvr.pl/en/contact-eng/>

**Chornobyl Liquidators on Steam, Xbox, and PlayStation:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at:

<https://livemotiongames.com/kontakt/>

**Train Station Renovation on Steam, Xbox, and PlayStation:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at:

<https://livemotiongames.com/kontakt/>

**Campus Life on Steam, Xbox, and PlayStation:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**Hairdresser Simulator on Steam, Xbox, and PlayStation:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**Hairdresser Simulator Long Hair DLC on Steam:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**Hairdresser Simulator Beards and Mustaches DLC on Steam:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**Train Yard Builder on Steam, Xbox, and PlayStation:**

The Controller does not collect or store any user data or personal data.

For additional questions, please contact the game developer at: [biuro@gameformatic.com](mailto:biuro@gameformatic.com)

**Games in the Playtest phase on Steam (Honeycomb: The World Beyond, Farmbotic, House Flipper Remastered Collection):** The Controller may process the personal data of Users participating in Playtests (e.g., e-mail address, Steam platform identifier) solely for the purpose of enabling access to the game, collecting opinions (feedback), and improving production quality, based on the User's voluntary consent or an invitation within the distribution platform. Regarding data collected automatically by external platforms (e.g., Steam Playtest) or analytical tools (e.g., Unity Analytics), the provisions indicated at the beginning of this section apply.