

**PRAXAL LLC**  
**PRIVACY POLICY**

**LAST MODIFIED ON MARCH 07, 2024**

Welcome to the *Praxal* Privacy Policy.

We ask that you read this privacy policy carefully, as it contains important information on who we are, how and why we collect, store, use, and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities.

## **1. Who we are**

Praxal LLC (“Praxal”, “We”, or “Us”) collects, uses, and is responsible for certain personal information about you, as part of offering Praxal’s video game software applications and the related Praxal website located at [www.praxal.com](http://www.praxal.com) (together, the “Service”).

For those in the European Union, we are regulated under the General Data Protection Regulation (“GDPR”) which applies across the European Union (including in the United Kingdom) and we are responsible as controller of that personal information for the purposes of those laws.

## **2. The Personal Information We Collect and Use**

**Information collected by us:** In the course of providing you with the Service, we collect the following personal information when you provide it to us or use the Service:

- Your name and email address are collected when you contact us for technical or customer support (your “Contact Information”).
- Your operating system version and other device-related info, user gameplay data (scores and gameplay progress) and device crash information (access and crash times) are collected automatically when you use the Service (your “Usage Information”).
- Your IP address, device type, operating system information, and information about your activities on the Service are collected automatically while you use the Service (your “Analytic Information”).

**Information shared with us:** In the course of providing you with the Services, other services may share the following personal information with us:

- Certain social media information may be collected when you connect a Facebook, Twitter, or other social media account with the Service (your “Social Media Information”).
- If you connect your Apple Game Center or Google Play Games accounts with the Service, they may share certain information with the Service (your “Game Account Information”).
- Your unique Advertising ID, and certain analytic information regarding ads which are displayed to you, such as clicks, app downloads, and watches, are shared with us by Apple Ads and Google Admob (your “Advertising Information”). We use Google Admob and Apple Ads to display these advertisements on the Service that are relevant to your interests. Your Advertising Information is shared with us by these companies in order to personalize these advertisements. You can view [the Google privacy policy here](#) and view [the Apple privacy policy here](#).

If you would like more information about online advertising and to know your choices about not having this information used by these companies, please see [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)

**How we use your personal information:** We use your personal information as follows:

- Your Contact Information is used to communicate with you about Service-related issues and provide customer and technical support (including receiving and responding to communications that you send us through the Service).
- Your Usage Information and Analytic Information is used to ensure the proper operation of the Service on your device and to analyze and improve the Service. To achieve this, we may make your Usage Information and the Analytic Information non-personally identifiable in aggregated or anonymized form, by either combining or aggregating it with information about other users, or by removing characteristics (such as your IP address) that make the information personally identifiable.
- Your Advertising Information is used to display personalized advertisements on the Service (see Who we share your Personal Information with, below, for more information) and analyze the effectiveness of those advertisements.
- Your Social Media Information and Game Account information is used to post high scores and other gameplay achievements to your connected account, when you choose to do so.

**Who we share your personal information with:** We share your personal information with certain third parties in operating the Service. This data sharing enables us to provide you with all of the Service's functionality.

Some of those third party recipients may be based outside the European Economic Area — for further information, including how we safeguard your personal data when this occurs, see their individual privacy policies linked to above and the section entitled “Transfer of your Information out of the EEA,” below.

We share your personal information with the following third parties:

- **High Scores and Gameplay Achievements:** When you choose to share your high scores and other gameplay achievements through the Service or through connected Social Media or other accounts, these may be shared with the public and the Social Media or other service that you've connected to the Service.
- **Analytics:** We use Google, Apple, and GoDaddy Analytics, which gather and pool your Analytic Information with other users' information, for the purposes of improving the Service, such as tracking the total number of users or visitors to the Service, their aggregate activities on the Service, gameplay data and other gameplay analytics, and tracking the sites that refer visitors to the Service. You can view [the Google privacy policy here](#), view [the Apple privacy policy here](#), and view [the GoDaddy privacy policy here](#).
- **Other Sharing:** In addition to the above, we will share your personal information if we have a good faith belief that (i) access, use, preservation or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, legal process, such as a court order or subpoena, or a request by law enforcement or governmental authorities, (ii) such action is

necessary to detect, prevent, or otherwise address fraud, security or technical issues associated with the Service, or (iii) such action is appropriate to protect the rights, property or safety of Praxal, its employees, clients, or users of the Service.

We will not share your personal information with any other third party.

**How long your personal information will be kept:** We will keep your personal information for as long as necessary to provide you with the Service or until you request its deletion, unless a longer retention period is required by law. Afterwards, we delete all such data in our possession within a reasonable timeframe.

We do not verify the correctness of personal data that we collect or that you provide.

Please note that some data may be retained, if necessary, to resolve disputes, enforce Praxal service agreements, and comply with technical and legal requirements and constraints related to the security, integrity, and operation of the Service.

**Reasons we can collect and use your personal information:** The laws in certain jurisdictions require that we notify you of the lawful basis for collecting your personal information.

To the extent that such laws apply, we rely on the following as the lawful basis on which we collect and use your personal information:

- **Consent:** We rely on your implied or explicit consent for the collection, processing, storage, transfer, and disclosure of your Contact Information, Social Media Information, and Game Account Information.
- **Furtherance of legitimate interests:** We may collect, process, store, transfer, or disclose your Usage Information, Analytic Information, and Advertising Information in furtherance of those legitimate interests of ours which are not overridden by your interests or fundamental rights and freedoms as set forth in the applicable laws. These legitimate interests include, but are not limited to, (i) providing you with the Service, (ii) protecting our users, staff, and property from fraud and other harm, (iii) providing you with personalized advertisements to fund development of the Service, and (iv) collecting information on how you use the Service in order to optimize the functionality of the Service.
- **Legal compliance:** We may collect, process, store, transfer, or disclose your personal information to comply with our legal obligations.

**Children's Privacy:** You must be at least 13 years of age to use the Service. Because of this, we do not knowingly collect any personal information from children under the age of 13. In addition, we may limit how we collect, use, and store some of the personal information of EU users between 13 and 16.

**Cookies and other Usage Information:** "Cookies" are small bits of electronic information that a website sends to a visitor's browser and are stored on the visitor's hard drive. Like many websites, we employ cookies in certain areas of the Praxal website to allow us to provide information to make your online experience more convenient and to enhance your experience with the site. Cookies are not spyware or adware, and can't deliver viruses or run programs on your computer. You may configure your web browsers to accept or reject or delete the cookies, or notify you when a cookie is being set.

We use these technologies on the Praxal website for the purpose of tracking user activity for analytics purposes, as follows:

- **Google Analytics:** We use Google Analytics on our website. On an anonymous basis, Google will analyze your use of the site on our behalf and provide analytics information to us in anonymized form. Google uses cookies to do this. You can [view their Privacy Policy here](#). You can also view
- **GoDaddy Analytics:** We use GoDaddy to build and host our website. On an anonymous basis, GoDaddy will analyze your use of the site on our behalf and provide analytics information to us in anonymized form. GoDaddy uses cookies to do this. You can [view their Cookie Policy here](#). There, you can find information on how to manage your cookies through your browser, if you choose to do so.
- **Browser Opt-Out Instructions:** You can also visit NAI's consumer opt-out (<http://www.networkadvertising.org/choices/>) for more information on opting-out of browser-based cookies.

**“Do Not Track” Signals:** Because there’s not yet a consensus on how companies should respond to web browser-based or other “do not track” mechanisms yet, we do not respond to web browser-based do not track signals.

### 3. Transfer of your Information out of the EEA

Praxal is based in the United States. No matter where you are located, you consent to the processing, transfer, and storage of your information in and to the United States and other locations where Google, Apple, and social media company servers are located.

The laws the United States governing data collection and use may not be as comprehensive or protective as the laws of the country where you live.

If you would like further information, please contact us (see “How to contact us” below).

### 4. EU Residents - Your Rights

Under the GDPR, EU residents have several important rights free of charge. In summary, those include the rights to:

- Fair processing of information and transparency over how we use your use personal information
- Access to your personal information
- Require us to correct any mistakes in your information which we hold
- Require the erasure of personal information concerning you in certain situations
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you

- Object in certain other situations to our continued processing of your personal information, or otherwise restrict our processing of your personal information in certain circumstances

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner’s Office on individuals’ rights under the GDPR.

If you would like to exercise any of those rights, please:

- Email us through our contact form located at <https://praxal.com/contact>
- Give us enough information to identify you, including your username, name, and date of birth
- Show us proof of your identity (a copy of your driving license or passport, for example), if necessary
- Let us know the information to which your request relates

## **5. Keeping Your Personal Information Secure**

We have taken steps to put appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to know it through access controls. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We use encryption on any stored player preference files, as well.

Additionally, we never ask you for passwords and we advise you never to enter any account name or password into an email or after following a link from an email.

Lastly, we also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## **6. How to Complain**

We hope that we can resolve any questions or concerns you raise about our use of your personal information. Please contact us via the method listed below in the section entitled “How to contact us” to let us know about any of your questions or concerns, and we will get back to you to resolve the issue.

If you are an EU resident, the GDPR also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live, or where any alleged infringement of data protection laws occurred.

## **7. Changes to this Privacy Policy**

This privacy policy was last updated on March 07, 2024.

We may change this privacy policy from time to time. When we do, we will inform you via through a message on the Service, or via email if you’ve submitted your email address.

## **8. How to Contact Us**

Please contact us if you have any questions about this privacy policy or the information we collect and store from you.

If you wish to contact us regarding this Privacy Policy, please send an email to us through our contact form located at <https://praxal.com/contact>.