DIGGING DEEP

The Digging Deep Project Privacy and Data Collection Policy

Introduction

We have updated our privacy policy for easy reading. You can now find an easy overview of all data we process in one place. We explain in simple terms why and how we process your data and what the legal basis for processing is. We also provide an overview of your data protection rights and when we might share your data and why.

Effective Date: This document applies to content and Applications released on October 21st, 2017, and later. Last updated on 1 August 2025.

About the Digging Deep Project

The Digging Deep Project is a non-profit and fiscally sponsored project of The Giving Back Fund based in Los Angeles, California, United States. The Digging Deep Project is owner and publisher of the Digging Deep Journal, the Shadow's Edge Guide to Self-Awareness, developer of the mobile game Shadow's Edge and all related products, websites, and social media sites. ("The Digging Deep Project", "DDP", "we", or "us").

Our Data Controller and Data Privacy Officer

In the context of data privacy, we are classified as a data controller. This means we are the organization that decides why and how we process your data to be able to provide our services to you.

Our representative in the EU is:
Nancy Imado Herbert
Agua Longa, Portugal
nancy@shadowsedge.com
Skype: nancy. imado

Our data privacy officer's contact details are:
Kevyn Eva Norton
kevyneva@shadowsedge.com
Zurich, Switzerland
Phone: +41 78 670 03 63
Skype: kevyn.eva

Introduction to our Privacy Policy

We are committed to safeguarding the privacy of our users and players. This Privacy and Data Collection Policy explains how DDP collects, uses, and discloses information about you.

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By using our products and services, you consent to this Privacy and Data Collection Policy. This privacy and data collection policy is part of our larger terms of services for our products and services.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as by adding a statement to our homepage or mobile games and applications or by sending you an email notification).

We encourage you to review the Privacy Policy whenever you access the Services to stay informed about our information practices and the ways you can help protect your privacy.

We may supplement or amend this policy by additional policies and guidelines from time to time. Any changes will be published on our websites: www.diggingdeep.org/privacy and/or www.shadowsedge.com/privacy respectively.

Information we collect and legal basis
This Privacy Policy applies to information we collect when you use our website, game, mobile applications, and other online products and services (collectively, the "Services"). Please note that this Privacy Policy does not affect or impact any of The Digging Deep Project products released prior to the Effective Date.

We will ensure that any personal data we process is accurate, adequate, relevant, and not excessive, given the purpose for which it was obtained. We will not process personal data obtained for one purpose for any unconnected purpose unless you have agreed to this or would otherwise reasonably expect this.

Information You Provide to Us
Please see the table below to understand what kind of information we collect, where we collect it, why we collect it, and what the legal basis is, that allows us to collect it.

Communicating with AI-Powered Characters Within Shadow's Edge (i.e. Chatbots).

The Digging Deep Project allows players to interact with characters powered by a large language model AI within Shadow's Edge. In many jurisdictions this would constitute an AI chatbot. All players are notified of the existence of these AI-powered characters before interacting with said characters. These AI-powered characters dynamically respond to prompts from players.

These AI-powered characters are not meant to provide any medical diagnosis, medical advice, medical treatment, legal advice, or provide or replicate the services of any other licensed professional. The AI-powered characters are explicitly not meant to act in the capacity of a licensed therapist. These AI-powered characters' statements should also not be relied upon as advice and

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the Digging Deep Project cannot, and does not, guarantee the accuracy of any statements made by any AI-powered character offered by the Digging Deep Project.

The Digging Deep Project may collect any statements made by a player to an AI-powered character, potentially including personally identifiable information. Personally identifiable information collected in this manner may be used for any purpose outlined in this Privacy Policy.

We use aggregated and de-identified information you provide to us for research purposes.

We may also share aggregated and de-identified information, which cannot be re-aggregated or re-identified so as to identify you (as those terms are defined under applicable law), to carry out research to improve our Services and to contribute to the knowledge about using digital tools for emotional and mental wellbeing.

Type of Data	Where we collect it	Purpose	Legal basis
Email	Game Registration, Blog or Newsletter sign-up, Playtests signups, surveys, Contest Sign-ups	So, you can log in to the game. So, we can send you our newsletter once you signed up. So, we can contact you regarding playtest organization once you signed up. So, we can send you technical notices, updates, security alerts, as well as support and administrative messages. So, we can inform you about upcoming releases and changes in our products.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Name	Blog or Newsletter sign-up, Playtests	So, we can inform you about our products, services,	We only collect this data with your explicit consent.

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	signups, surveys, Contest Sign-ups	rewards, and news about our services we think will be of interest to you. So, we can point out events offered by The Digging Deep Project and our partners.	
Hometown/Address	Public campaigns, Contests, sweepstakes	So, we can communicate with you about the campaign, contest, or sweepstake.	We only collect this data with your explicit consent.
Personal pronouns	Contact forms	So, we address you correctly when we communicate with you.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Profile Picture / Nickname	Social media, Game Profile	So, we can display your profile as per your preferences.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Year of Birth	Online Surveys, Public campaigns, Contests, Sweepstakes	We collect the year of birth to understand whether we need to send you a parental consent form to participate in our playtests and surveys.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Financial Information / Social Security Numbers	Public campaigns, Contests, Sweepstakes	We use this information exclusively for prize fulfilment and related tax purposes.	We only process this data with your explicit consent.
Username / Password	Game Registration and profile update	So, you can log in securely into the game.	Processing this data is a necessity so we can perform the

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			contract with you and deliver our services to you.
Specific health conditions / Treatment History	Online Surveys	We are creating products for mental and emotional wellbeing. We aim to understand our users' situation around mental and emotional wellbeing to create products that serve your needs.	We only process this data with your explicit consent.
Treatment Hospital	Game: Shadowgram	The first version of Shadow's Edge was created for young people who spend time in hospitals due to a chronic or serious illness. We may organize special events for players in specific hospitals.	We only process this data with your explicit consent.
Gaming Preferences	Online surveys	We are creating games that aim to make self-care fun. Thus, we are interested to learn about your preferences.	We only process this data with your explicit consent.
Shadowgram uploads	Game: Shadowgram	Information shared anonymously in the in-game community may be used for our marketing as per our terms of service. Any such information will be strictly anonymous and only if the user has shared it in the	We only process this data with your explicit consent.

		public part of the game or our social media or website.	
Journal Entries	Game — these are stored on your device and, if you choose, also in a cloud database	Journal prompts and allowing you to reread what you wrote is a core part of the service we provide to you with the game.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Painted Walls	Game — these are stored on your device and, if you choose, also in a cloud database	Painted walls and allowing you to create a city that looks like you want it to be a core part of the service we provide to you with the game.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Posts and comments	Social media	We may use information that you have posted on our social media, our website, or blog for social media and advertisement campaigns we conduct. We also use this information to respond to your comments, questions, and requests and provide customer service.	We only process this data with your explicit consent.
Contest entry information	Public campaigns, Contests, sweepstakes	We process and deliver contest entries and rewards. We may use information specific to participants and prize winners of public campaigns, contests, or	We only process this data with your explicit consent.

		sweepstakes (including such campaigns with partners) for advertisements, marketing, and other campaign-related communication, by both The Digging Deep Project and the respective partners.	

Information We Collect Automatically When You Use the Services

Type of Data	Collection Point	Purpose	Legal basis
Device and Technology Information	Game	We collect device-specific information when you access our Services from a mobile device to track performance and technical issues.	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.
Such as: Hardware model, Operating system, OS Version, unique device identifiers, mobile network information, country			
Use Information	Websites, Game	We use this data to monitor and analyze trends, usage, and activities in connection with our Services. We may	Processing this data is a necessity so we can perform the contract with you and deliver our services to you. We

		also use this data to personalize and improve the Services and provide content, suggested connections, or features that match user profiles or activities. We might also share this data with research partners. This is only done in an aggregated anonymized fashion or with your explicit consent in case of individual usage data.	process individual usage data with your explicit consent.
Such as date/time, access times, pages viewed, number of clicks, IP Address, page visited before navigating to our services, gameplay activity, game logins, game progress, pages written, walls painted, Shadowgram posts, interaction with other players, stamps			
Demographic Information Such as internet protocol (IP) addresses, browser type, internet service provider	Websites, Social Media Campaigns, App Store Campaigns — see section cookies and tracking technologies for	We may also use this data to personalize and improve the Services and provide content, suggested	Processing this data is a necessity so we can perform the contract with you and deliver our services to you.

(ISP), platform type, gender, age group, interests	more information on where we collect this data	connections or features that match user profiles or activities.	

Cookies and Tracking Technologies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies or other tracking technologies, this could affect the availability and functionality of our Services.

Cookies are small data files stored on your hard drive or in device memory that help us to improve our Services and your experience. They allow us to see which areas and features of our Services are popular and to count visits. We ask your explicit consent prior to the use of these cookies on our websites. To learn more about cookies please refer to: https://allaboutcookies.org

Please see here a list of cookies used on our websites:

Essential Cookies

Cookie key	Domain	Type	Expiration	Description
XSRF-TOKEN	www.diggingdeep.org	First-party	Session	This cookie is written to help with site security in preventing Cross-Site Request Forgery attacks and is set by GoDaddy.
hs	www.diggingdeep.orhg	First-party	Session	Used for security reasons by GoDaddy.
sp_t	. spotify.com	Third-party	1 year	Required to ensure the functionality of the integrated

				Spotify plugin. This does not result in any cross-site functionality.
sp_landing	.spotify.com	Third-party	1 day	Required to ensure the functionality of the integrated Spotify plugin. This does not result in any cross-site functionality.
ssr-caching	www.diggingdeep.com	First-party	29 seconds	Indicates how a site was rendered. Set by Godaddy website

Targeting Cookies

Cookie key	Domain	Type	Expiration	Description
svSession	www.diggingdeep.org	First-party	2 years	Identifies unique visitors and tracks a visitor's sessions on a site
YSC	.youtube.com	Third-party	Session	This cookie is set by YouTube to track views of embedded videos.
VISITOR_INFO1_LIVE	.youtube.com	Third-party	6 months	This cookie is set by YouTube to keep track of user preferences for YouTube videos embedded in sites; it can also determine

				whether the website visitor is using the new or old version of the YouTube interface.

Performance Cookies

Cookie key	Domain	Cookie type	Expiration	Description
_gat_UA-60144440-1	.diggingdeep.org	First-party	1 minute	This is a pattern type cookie set by Google Analytics, where the pattern element on the name contains the unique identity number of the account or website it relates to. It is a variation of the _gat cookie which is used to limit the amount of data recorded by Google on high traffic volume websites.
_gid	.diggingdeep.org	First-party	1 day	This cookie is set by Google Analytics. It stores and updates a unique value for each page

				visited and is used to count and track pageviews.
_ga	.diggingdeep.org	First-party	2 years	This cookie name is associated with Google Universal Analytics – which is a significant update to Google's more commonly used analytics service. This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the site's analytics reports.

Marketing Cookies

Cookie key	Domain	Cookie type	Expiration	Description
_ga_1GFGQNQH8D	.diggingdeep.org	First-party	2 years	Marketing cookies set

				by WordPress
MtidPo_DAmQvhznG	diggingdeep.org	First-party	1 day	Marketing cookies set by WordPress
JwMLUy-xkY	diggingdeep.org	First-party	1 day	Marketing cookies set by WordPress
cQtoSaMOiG	diggingdeep.org	First-party	1 day	Marketing cookies set by WordPress
hvjOntkfyCbu	diggingdeep.org	First-party	1 day	Marketing cookies set by WordPress
fedops.logger.defaultOverrides	www.shadowsedge.com	First-party	1 minute	Marketing cookies set by Wix
TS01ded329	www.shadowsedge.com	First-party	Session	Marketing cookies set by Wix
TS01e921e9	www.shadowsedge.com	First-party	Session	Marketing cookies set by Wix
TS01e85bed	www.shadowsedge.com	First-party	Session	Marketing cookies set by Wix
TS01870529	www.shadowsedge.com	First-party	Session	Marketing cookies set by Wix

Web beacons

These are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and determine whether an email has been opened and acted upon. They allow us to understand whether a campaign is effective and interesting to you and whether you interact with the content we provide. We use this information to create content that is relevant and useful to you.

Tracking and Analytics Technologies

We share your data with the following tracking and analytics technology providers:

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Google Analytics
We use Google Analytics to collect audiences to analyze trends, administer the site, and ensure that our site is accessible and viewable by our general audience. We do not have control over nor access to the information collected by this site, and we recommend that you view their Privacy Policies for more information.
https://policies.google.com/privacy

Twitter Website Universal Tag
This is a tool from Twitter that makes it possible for us to track website conversions and manage tailored audience campaigns. We use this to understand whether our Twitter campaigns are effective and whether you interact with our content. For more information see
https://twitter.com/en/privacy

Twitter conversion tracking
The Twitter ads conversion code allows us to see which campaigns you reacted to. We use this to make our content more relevant. For more information see https://twitter.com/en/privacy

Facebook Pixel
Facebook Pixel is Facebook's conversion tracking system for ads on Facebook to websites. It allows us to see which Facebook campaigns you clicked on to land on our website or game. For more information see https://www.facebook.com/privacy/policy

Facebook Conversion Tracking
This technology allows us to see which advertisements you clicked. For more information see
https://www.facebook.com/privacy/policy

Firebase
This technology allows us to track how you use the Shadow's Edge game, when you first download it, which campaign brought you to it. For more information see https://policies.google.com/privacy

Game Analytics
This technology allows us to track how you use the Shadow's Edge game, when you first download it, which campaign brought you to it. For more information see https://gameanalytics.com/privacy/

Third party services
We may allow third parties to provide analytics services and provide you with other services, such as rewards programs. We will inform you about these third parties at the point of use with an option for you to opt in or out. These third parties may use cookies, web beacons, your account information (that you set up with these third parties) and other technologies to collect information about you on our Services and other websites and online services, such as your IP addresses, identifiers associated with your mobile device or applications on the device, the browsers you use to visit our Services, pages viewed, time spent on pages, links clicked, and conversion information.

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These third parties may also share this information with their customers and clients. This information may be used by The Digging Deep Project, and these other companies to analyze and track data, determine the popularity of certain content, and better understand your usage. Some of these third-party service providers offer you a choice to opt out the collection of and/or sharing of this information. Please refer to their websites as to how to opt out.

How we share your Information
Sharing with partners who help us create our products and services

It takes many kinds of skillsets to create our product, and we don't have all of those in-house. We may share your data with trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. Partners we are working with that can have access to your information to carry out work on our behalf:

- For the game development we work with game studio Stickylock (https://www.stickylock.com) to develop the Shadow's Edge Game.

- To run the backend of the game, essentially the database where your game progress, journals and art are stored we have a contract with Microsoft Azure in place. (https://www.azure.microsoft.com)

- To help us configure and operate the backend for the game we work with GSD Technologies (https://www.gsd-technologies.net)

Sharing to comply with Legal requirements
We share your data with legal authorities in the following cases:

- In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation.

- If we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of The Digging Deep Project or others.

- In connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

Sharing with Research Partners
We share your data in an aggregated and anonymized manner with academic research

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partners and partners who do machine learning on it for analytical purposes such as GSD Technologies mentioned above. By anonymizing and aggregating the data before transfer we ensure no identifiable information about you is shared without your explicit consent.

In case you sign-up for research that uses the game Shadow's Edge as an intervention, the research partner will ask for your consent directly to receive your data. We do not share any individual usage data without your explicit consent and for the specific studies you have opted in for.

Plugins used in our services
We use various plugins from providers such as Instagram, Twitter, Spotify, YouTube, WordPress, Wix to display content from those providers on our websites. The plugins may track usage data that can be linked back to your social media profile on those platforms. Please refer to their privacy policies to learn more about their data practices.

Sharing with Advertising Services
We do not sell, trade, or otherwise transfer your personally identifiable information to outside parties. We do not have Advertising Services in our products.

Sharing with Partners for Campaigns or Competitions
When you sign up for specific campaigns, competitions or sweepstakes we ask for your consent to process your submission and personal data as listed in the section above about types of data we process. This includes sharing information with partners who help us fulfil prizes and gift vouchers.

Sharing with analytics partners
Please refer to section above on tracking and analytics technologies.

Information you opt to share via Social Sharing Features
Our services may offer social sharing features and other integrated tools (such as the

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"Like" buttons in Facebook or Instagram, or for example the option in Shadowgram to share images with your network). The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

Please note we inform our players about the best practices of sharing and other community rules of engagement on our website in our **Community Guidelines**.

Automated decision making and profiling
We are not using any artificial intelligence or other tools for profiling and deep personalization or predictive technologies. In case we change this practice, we will update this policy and inform you about it.

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International Transfer of Data
The Digging Deep Project is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

All game data is stored in Europe in the Microsoft Azure region West data centres in the Netherlands. This means all data you upload to the game will be transferred to the Netherlands. Processing of your data can happen in Europe or in Latin America, if you are located there. The Digging Deep team is located in the US, Switzerland, the Netherlands and Portugal and your data might be accessed from these locations.

Additionally, we may transfer data to our partners who do machine learning on the anonymized data. This partner is GSD Technologies based in the USA. We also might

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transfer data to our partner CINDE in Colombia for research purposes – but only if we have your explicit consent for this.

By reading this privacy policy, you acknowledge that personal data that you submit for publication through our social media channels, website or Shadowgram may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

How long we store your data.
We store your personal data for five years after you do not use our services anymore. You can request us to delete your data at any time.

How we keep your data safe / Security
The Digging Deep Project takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

Where other organizations process personal data as a service on our behalf, the persons responsible for GDPR compliance will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third-party organizations.

We provide great care to protect the privacy of our players. The player's registration information and player content are stored on their local device and on a central service on Microsoft Azure.

User generated content can be shared in-game in Shadowgram. Such content is also stored centrally at the Microsoft Service. User generated content can further be shared by taking a screenshot and sharing that screenshot via the device with any media or save it locally. The Digging Deep Project is not responsible for any of such shared content.

Your data protection rights

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Fair and lawful processing
We can only process your personal data for legitimate and specified purposes.

Right to withdraw consent at any time.
Where we process data based on your explicit consent, you have the right to withdraw this consent at any time.

Right to lodge a complaint.
You have the right to lodge a complaint with the supervisory authority in your country.

You have the right to transparency.
This means that you should receive information on how your personal data will be processed in a clear, concise and transparent way. Information on the processing of your personal data must be provided to you in an easily accessible format.

You have the right to be informed.
This includes information on how and the purpose for which your data is processed, the identity of the controller who processes your data, the categories of data concerned and to whom data is disclosed, including outside the EU.

You have the right to access your personal data.
This means that you can, for example, obtain a copy of the data concerned and some information concerning the processing in your specific case, for instance the purpose of that particular processing and the recipients to whom your personal information is disclosed.

Right to erasure («Right to be forgotten»)
If your personal data is no longer needed by the Digging Deep Project, if you withdraw the consent you previously gave to the processing of your data, or if the processing operation is unlawful, you can ask the Digging Deep Project to erase your personal data.

Right to restrict the processing of your data.
Under certain circumstances, for example if you contest the accuracy of the data that the Digging Deep Project is processing about you, or if you are not sure that your data is being processed lawfully, you can ask the controller to restrict the processing of your data. This means that the controller can store your data but cannot process it in any other way temporarily.

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Right to data portability
This right allows you to obtain the data that the controller has about you and to transmit this data from one controller to another.

Right to rectification.
If your data is inaccurate or incomplete, you can ask us to rectify this data.

Right to object to automated individual decision making.
You have the right to object to a decision based on an automated process, such as profiling, if this may result in legal consequences for you or significantly affect you in a similar way.

Right to object.
You can object, on compelling and legitimate grounds, to the processing of your data.

External Links
Our web site contains links to other sites. Please be aware that The Digging Deep Project, is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by this web site.

Contact Us
If you have any questions about this document, our Services, our Privacy policy or wish to report a violation, please contact us at: privacy@diggingdeep.org

You may also contact our Privacy Policy Administration by writing to:

Privacy Policy Administration
The Digging Deep Project
c/o The Giving Back Fund
2208 Canyon back Road
Los Angeles, CA 90049-1177
USA

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