Privacy Policy for Bagsman - Football RPG

Effective Date: 28 October 2026
Last Updated: 28 October 2026
Version: 1.0

1. Who We Are

Data Controller:
FinSpark Technologies Ltd
Company Registration Number: 16366811
Registered Address: 7 Shelford Avenue, Kirkby-In-Ashfield, Nottingham, England, NG17 8HF
Email: James@FinSpark.co.uk
Website: https://finspark.co.uk/

FinSpark Technologies Ltd ("we", "our", "us") develops and publishes "Bagsman - Football RPG" (the "App"). This Privacy Policy explains what personal data is processed when you use the App, who processes it, why, how long it is kept, and the rights you have over it.

Data Protection Officer: We are not required to appoint a Data Protection Officer under Article 37 of the UK General Data Protection Regulation ("UK GDPR"). Questions about this policy can be sent to the email address above.

2. Summary

This summary is provided for convenience. The full detail is in the sections that follow.

- **No account with us.** The App does not ask for your name, email address, phone number or date of birth, and you do not create an account with us.
- **Your game stays on your device.** Your progress, match results and settings are saved on your device. We do not receive or store them.
- **Ads only when you choose.** The App shows an advert only when you choose to watch one to earn an extra Match Ball. Adverts are provided by Google AdMob, and you choose whether Google can use your data to personalise them.
- **Purchases are handled by Google Play or the Apple App Store.** We never see your card or bank details.
- **We do not sell your data**, send marketing messages, or track your precise location.

3. Information Processed When You Use the App

3.1 Gameplay Data (stored on your device)

What it includes: Your game progress, match results and statistics, your Match Ball allowance and the time it was last reset, whether you have bought the Unlimited Match Balls upgrade, your advertising and privacy choices, and your App settings.

Where it is stored: On your device only. This data is not sent to us and we have no ability to view, back up, restore or recover it.

Device backups: If you have your device's backup feature turned on (Android backup to your Google Account, or iCloud or computer backup on iPhone and iPad), the App's saved data may be included in that backup. Backups are managed by Google or Apple under your account settings, not by us, and we cannot access them.

Why: To make the game work and save your progress.

How to delete it: On Android, uninstall the App or clear its storage (Settings > Apps > Bagsman > Storage > Clear storage). On iPhone and iPad, delete the App. This permanently deletes your progress on that device, although a copy may remain in any device backup until that backup is deleted or replaced.

3.2 Purchase Information

All purchases are made through Google Play or the Apple App Store and processed by Google or Apple respectively. They are responsible for your payment information, and we never receive your card details, bank details, billing address or the name on your account.

What we receive from Google or Apple: A transaction or order number, the item purchased, the date and price, and limited location information such as country (and, from Google, region), which the stores provide to developers for tax and reporting purposes. The App also receives a purchase confirmation from the store so that it can unlock and restore your purchase.

Why: To deliver and restore your purchase, to deal with refunds and support queries, and to keep the financial records we are legally required to keep.

Legal basis: Performance of our contract with you (UK GDPR Article 6(1)(b)) and compliance with legal obligations, including tax and company law (Article 6(1)(c)).

3.3 Advertising Data (Google AdMob)

The App uses Google AdMob, operated by Google Ireland Limited (for users in the UK, EEA and Switzerland) and Google LLC (elsewhere), to show rewarded adverts on both Android and iOS. An advert is shown only when you choose to watch one in exchange for an extra Match Ball. The App does not show banner or pop-up adverts.

What Google collects when an advert is requested or shown: Your device's advertising identifier (on Android, the advertising ID and App Set ID; on iOS, the Identifier for Advertisers (IDFA) only if you allow tracking, and otherwise the Identifier for Vendors (IDFV)), IP address, approximate location derived from your IP address (country or city level), device model, operating system version, language, information about your interaction with the advert, and diagnostic information about how the advert performed.

Why: To serve the advert, confirm that you watched it so that your reward can be given, measure advert performance, limit how often you see the same advert, and detect and prevent fraud. Where you have agreed, Google also uses this data to personalise the adverts you see.

Your consent choices (UK, EEA and Switzerland): The first time an advert could be shown, the App displays a consent message provided through Google's consent tools. You can choose whether to allow your device's identifiers and data to be used for advertising, including personalised advertising. If you do not consent, Google will show "limited ads", which are designed to operate with restricted use of your data, as described by Google. You can change your choice at any time using the "Privacy choices" option in the App's settings.

Apple's tracking permission (iPhone and iPad): On iOS, the App will ask your permission through Apple's App Tracking Transparency prompt before your device's IDFA can be accessed. If you select "Ask App Not to Track", the IDFA is not available to the App or to Google and you will not receive adverts personalised using it. You can change this at any time in Settings > Privacy & Security > Tracking.

Legal basis: Consent (UK GDPR Article 6(1)(a) and Regulation 6 of the Privacy and Electronic Communications Regulations 2003) for storing and accessing information on your device, for accessing your IDFA, and for personalised advertising. Where limited ads are shown without consent, Google relies on its own legal bases as described in its privacy policy.

Google's role: Google acts as an independent controller of the data it collects through AdMob and decides how that data is used. We do not receive or store this data. We receive only aggregated reports, such as the total number of adverts shown and revenue earned, which do not identify you.

Google's privacy policy: https://policies.google.com/privacy
How Google uses data from apps that use its services:
https://policies.google.com/technologies/partner-sites

Other controls: On Android you can reset or delete your advertising ID (Settings > Privacy > Ads, or Settings > Google > Ads, depending on your device). On iOS you can turn off "Allow Apps to Request to Track" in Settings > Privacy & Security > Tracking.

3.4 Crash and Performance Reports (Google Play Console and App Store Connect)

If you have chosen in your device settings to share usage and diagnostic data with app developers, Google Play or Apple provides us with reports about App crashes and performance. These reports include technical details such as device model, operating system version, App version and the technical cause of the crash. They are designed not to identify you and do not include your name or contact details.

Why: To find and fix bugs and keep the App stable.

Legal basis: Legitimate interests (UK GDPR Article 6(1)(f)): our interest in keeping the App working properly, which also benefits you. You can stop sharing this data at any time in your device's settings (on iOS, Settings > Privacy & Security > Analytics & Improvements > Share With App Developers).

3.5 Information You Send Us

If you email us, we process your email address, your name (if you give it), the content of your message, and any information you choose to include, such as screenshots or a Google Play order number.

Why: To respond to your query, provide support, deal with refunds and complaints, and handle data protection requests.

Legal basis: Legitimate interests (UK GDPR Article 6(1)(f)): responding to people who contact us. Where your message relates to a purchase, we also rely on performance of our contract with you (Article 6(1)(b)), and where it is a data protection request, we rely on compliance with our legal obligations (Article 6(1)(c)).

Where it is stored: In our email system, provided by Microsoft 365.

4. What We Do Not Do

- We do not require or offer user accounts.
- We do not collect your precise location, contacts, photos, files, microphone or camera data.
- We do not sell, rent or trade personal data.
- We do not send marketing emails or push notifications for marketing purposes.
- We do not carry out profiling or automated decision-making that has legal or similarly significant effects on you.
- The App has no chat, messaging or user-uploaded content.

5. Legal Bases for Processing (Summary)

Data	Purpose	Legal basis (UK GDPR)
Gameplay data	Running the game on your device	Not received by us; stored on your device under your control
Purchase information	Delivering and restoring purchases, refunds	Contract, Article 6(1)(b)
Financial and transaction records	Tax and accounting	Legal obligation, Article 6(1)(c)

Advertising data (device storage, IDFA and personalisation)	Showing rewarded adverts	Consent, Article 6(1)(a) and PECR Regulation 6
Crash and performance reports	Fixing bugs and improving stability	Legitimate interests, Article 6(1)(f)
Emails and support requests	Responding to you	Legitimate interests, Article 6(1)(f); contract or legal obligation where relevant
Data protection requests and complaints	Meeting our legal duties	Legal obligation, Article 6(1)(c)

6. Who We Share Data With

We share personal data only with:

- **Google** (Google Play, Google Play Billing and Google AdMob), as described in Section 3. Google acts as an independent controller for these services.
- **Apple** (the App Store and App Store payments), as described in Section 3. Apple acts as an independent controller for these services.
- **Microsoft** (Microsoft 365), which hosts our email as our processor under contract.
- **Our professional advisers**, such as our accountant, where necessary for tax, accounting or legal purposes, and only the minimum needed.
- **Authorities and others where required by law**, for example to comply with a court order, or where necessary to establish, exercise or defend legal claims, protect our rights or prevent fraud.
- **A buyer or successor**, if our business or the App is sold, merged or transferred. The new owner would be bound by this Privacy Policy, and we would tell you about the change.

7. International Data Transfers

We are based in the United Kingdom. We do not transfer your data abroad ourselves, but our service providers may process data outside the UK and EEA, including in the United States:

- **Google:** relies on the UK Extension to the EU-US Data Privacy Framework, the EU Standard Contractual Clauses with the UK Addendum, and the UK International Data Transfer Agreement, as applicable.
- **Apple:** relies on Standard Contractual Clauses and other safeguards described in Apple’s privacy policy (https://www.apple.com/legal/privacy/).
- **Microsoft:** relies on the UK Extension to the EU-US Data Privacy Framework and Standard Contractual Clauses, as applicable.

You can ask us for more information about these safeguards by emailing James@FinSpark.co.uk.

8. How Long We Keep Data

Data	Retention
Gameplay data	On your device until you uninstall the App or clear its storage. We hold none.
Purchase and financial records	6 years from the end of the financial year in which the transaction took place, as required by UK company and tax law
Emails and support correspondence	Up to 12 months after your query is resolved, then deleted
Records of data protection requests and complaints	Up to 2 years after the matter is closed, so that we can show how it was handled
Crash and performance reports	Held by Google or Apple in their developer consoles under their retention periods
Advertising data	Held by Google under its own retention periods (see Google's privacy policy)

We may keep information for longer if it is needed to establish, exercise or defend a legal claim.

9. Your Data Protection Rights

Under the UK GDPR and the Data Protection Act 2018, and equivalent laws in the EEA, you have the following rights. Some rights apply only in certain circumstances.

- **Right of access:** to ask for a copy of the personal data we hold about you.
- **Right to rectification:** to ask us to correct inaccurate or incomplete data.
- **Right to erasure:** to ask us to delete your data.
- **Right to restriction:** to ask us to limit how we use your data.
- **Right to data portability:** to receive data you gave us in a structured, commonly used, machine-readable format.
- **Right to object:** to object to processing based on legitimate interests.

- **Right to withdraw consent:** where we rely on consent, such as for advertising, you can withdraw it at any time using “Privacy choices” in the App’s settings. This does not affect processing that took place before you withdrew it.

Please note: Because the App does not use accounts and your gameplay data never leaves your device, we usually hold very little information that can be linked to you. To help us find your data, please include any relevant details, such as the email address you contacted us from or your Google Play order number. For data held by Google (advertising and Google Play), you can also exercise your rights directly with Google at https://myaccount.google.com. For data held by Apple (the App Store), you can contact Apple at https://privacy.apple.com.

How to make a request: Email James@FinSpark.co.uk with the subject line “Data Rights Request” and tell us which right you want to exercise.

Response time: We will respond within one month of receiving your request. If your request is complex, or you make several requests, we may extend this by up to two further months and will tell you why within the first month.

Identity verification: We may ask for information to confirm your identity before acting on a request.

Fees: Requests are free. We may charge a reasonable fee, or refuse, only where a request is manifestly unfounded or excessive.

10. Complaints

If you are unhappy with how we have handled your personal data, please tell us first so we can try to put it right. Email James@FinSpark.co.uk with the subject line “Data Protection Complaint”. We will acknowledge your complaint within 30 days, investigate it without undue delay, and tell you the outcome.

You also have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority:

- Website: https://ico.org.uk/make-a-complaint/
- Telephone: 0303 123 1113
- Address: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

If you live in the EEA, you can complain to the data protection authority in your country. A list is available at https://www.edpb.europa.eu/about-edpb/about-edpb/members_en

11. Children

The App is intended for players aged 13 and over and is not directed at children under 13. We do not knowingly collect personal data from children under 13, or under the age of digital consent in their country if that is higher (up to 16 in some EEA countries).

The App does not include accounts with us, chat, user-generated content or location tracking. If you are under 18, we recommend that you talk to a parent or guardian before making any choices about advertising or making a purchase.

If you are a parent or guardian and believe your child has sent us personal data, for example by email, please contact us at James@FinSpark.co.uk and we will delete it. Data held by Google or Apple can also be managed through the child's account, Google Family Link, or Apple's Screen Time and Family Sharing settings.

12. Security

We take appropriate technical and organisational measures to protect personal data, including:

- Communication between the App and Google's and Apple's services is encrypted in transit (HTTPS/TLS).
- Gameplay data is kept in the App's private storage on your device, protected by the app sandboxing and device encryption built into Android and iOS.
- Our email and business accounts are protected by multi-factor authentication.
- Access to personal data is limited to people who need it.

No method of transmission or storage is completely secure, so we cannot guarantee absolute security. If a personal data breach occurs that is likely to result in a risk to your rights and freedoms, we will notify the ICO within 72 hours of becoming aware of it where required. If the breach is likely to result in a high risk to you, we will also tell you without undue delay.

13. Changes to This Privacy Policy

We may update this Privacy Policy to reflect changes to the App, the services we use, or the law. When we do, we will update the "Last Updated" date and version number above. If we make significant changes, such as adding a new type of data collection or a new third-party service, we will tell you in the App before the change takes effect, and we will ask for your consent again where the law requires it.

Version History:

- Version 1.0 - 28 October 2026 - Initial policy

Previous versions are available on request by emailing James@FinSpark.co.uk.

14. Contact Us

If you have questions about this Privacy Policy or how we handle personal data:

Email: James@FinSpark.co.uk
Post:
FinSpark Technologies Ltd
7 Shelford Avenue
Kirkby-In-Ashfield

Nottingham
NG17 8HF
United Kingdom

We aim to reply to general queries within 5 business days.