

Tiles of Fortune Privacy Policy

We at G.S Innplay Labs Ltd. (“Innplay Labs”, “us”, “we”, or “our”) recognize and respect the importance of maintaining the privacy of our users. This Privacy Notice describes the types of information we collect from you when you visit our website (“Site”) and/or play mobile games through our mobile applications (“Apps”). This Privacy Notice also explains how we process, transfer, store, and disclose the information collected, as well as your ability to control certain uses of the collected information. If not otherwise defined herein, capitalized terms have the meaning given to them in the Terms of Service, available at <https://innplaylabs.com/Tiles-of-Fortune> (“Terms”). “You” means any adult user of the Site or an App or any parent or guardian of any minor whom you allow to use the Site or an App, and for whom you will be held strictly responsible.

If you are an individual located in the European Union (“EU Individual”), some additional terms and rights may apply to you, as detailed herein. Innplay Labs is the data controller in respect of the processing activities outlined in this Privacy Notice. Our registered office is Uri Zvi Greenberg 30, Herzliya and our registration number is 516059656. You can contact our representative in the European Union at: Maetzler Rechtsanwalts GmbH & Co KG, Attorneys at Law, c/o G.S Innplay Labs, Schellinggasse 3/10, 1010 Vienna, Austria. Please include the subject “GDPR-REP ID: 12481059” on all correspondence. In addition, if you want to want to exercise your rights as a data subject, as described below, you can visit <https://gdpr-rep.eu/q/12481059>.

“Personal Data” means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law. This Privacy Notice details which Personal Data is collected by us in connection with the provision of the Site and Apps.

Privacy Notice Key Points

The key points listed below are presented in further detail throughout this Privacy Notice. You can click on the headers in this section in order to find out more information about any topic. These key points do not substitute the full Privacy Notice.

1. [Personal Data We Collect, Uses, and Legal Basis.](#)
2. [Use of Statistical Information and Analytics.](#)
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1. [Personal Data We Collect, Uses, and Legal Basis.](#) Depending on your usage, we collect different types of data and we and any of our third-party subcontractors and service providers use the data we collect for different purposes, as specified below. It is your voluntary decision whether to provide us with certain Personal Data, but if you refuse to provide such Personal Data we may not be able to provide you with the Apps or part thereof.

If you are a visitor to our Site, we may collect the following Personal Data about you:

- Automatically Collected Data – When you visit the Site, we automatically collect information about your computer, including non-Personal Data such as your operating system, and Personal Data such as IP address, general information

about your location (country and city), and any information regarding your viewing history on our Site. For more information about the cookies and similar technologies we use and how to adjust your preferences, please see the section "Cookies and Similar Technologies" below.

How we use this data: (1) to review usage and operations, including in an aggregated non-specific analytical manner, develop new products or services and improve current content, products, and Apps; and (2) to prevent fraud, protect the security of our Site and address any problems with the Site.

Legal Basis: We process this Personal Data for our legitimate interests to develop and improve our products and Apps, review usage, perform analytics, prevent fraud, for our recordkeeping and protection of our legal rights.

- Contact Information – When you request information from us, or contact us for any other reason, we will collect any data you provide, such as your email address and the content of your inquiry.

How we use this data: To respond to your request or inquiry.

Legal Basis: We process this Personal Data based on the performance of a contract when we respond to your inquiry

If you are using our Apps, we may collect the following Personal Data about you:

- Facebook Account Data – To the extent you login using your Facebook account, we will have access to certain Personal Data about you through your account, namely, your name, email address, and list of friends.

How we use this data: To allow you to log in to use the Apps through your Facebook account.

Legal Basis: We process this Personal Data for the purpose of performance of a contract with you.

- Automatically Collected Data – When you use the Apps, we automatically collect information about your mobile device, including non-Personal Data such as your operating system, and Personal Data such as device ID, as well as your usage history, general information about your location (country and city), and any information regarding your viewing and purchase history on our Apps.

How we use this data: (1) to review usage and operations, including in an aggregated non-specific analytical manner, develop new products or services and improve current content, products, and Apps; (2) to prevent fraud, protect the security of our Apps, and address any problems with the Apps; and (3) to provide you with targeted offers and advertising related to our products and services, based on your usage history on the Apps and on other third-party sites or apps you may visit or use.

Legal Basis: We process this Personal Data for our legitimate interests to develop and improve our products and Apps, review usage, perform analytics, prevent fraud, for our recordkeeping and protection of our legal rights, and when serving you with targeted marketing offers, your consent.

2. Use of Statistical Information and Analytics. We and/or our service providers use analytics tools, including “Google Analytics” to collect and analyze information about the use of the Site and/or Apps, such as how often users visit the Apps, what pages they visit when they do so, and what other sites and mobile applications they used prior to visiting the App. By analyzing the information we receive, we may compile statistical information across a variety of sites and users, which helps us improve our Site and Apps, understand trends and customer needs and consider new products and services, and tailor existing products and services to customer desires. You can find more information about how Google collects information and how you can control such use at <https://policies.google.com/technologies/partner-sites>.
3. Sharing the Personal Data We Collect. We share your information, including Personal Data, as follows:
 - Service Providers, and Subcontractors. We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers

and subcontractors, who have agreed to confidentiality restrictions and who use such information solely on our behalf in order to: (1) help us provide you with the Site and/or Apps; (2) aid in their understanding of how users are using our Site and/or Apps; and (3) to help us serve advertisements (see above for more details).

Such service providers and subcontractors provide us with IT and system administration services, data backup, security, and storage services, data analysis, and help us serve advertisements.

- Business Transfers. Your Personal Data may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition (including in cases of liquidation) in such case, your Personal Data shall continue being subject to the provisions of this Privacy Notice.
- Law Enforcement Related Disclosure. We may share your Personal Data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our or a third party's rights, property, or safety (including the enforcement of the Terms and this Privacy Notice); (ii) when required by law, regulation subpoena, court order or other law enforcement related issues, agencies and/or authorities; or (iii) as is necessary to comply with any legal and/or regulatory obligation.
- Legal Uses. We may use your Personal Data as required or permitted by any applicable law, for example, to comply with audit and other legal requirements.
- Other Uses or Transfer of Your Personal Data. If you use our Site and/or Apps with or through a third-party service, site, and/or mobile application, we may receive information (including Personal Data) about you from those third Please note that when you use third parties outside of our Site and/or Apps, their own terms and privacy policies will govern your use of those services.

4. International Transfer.

- We use subcontractors and service providers who are located in countries other than your own and send them information we receive (including Personal Data). We conduct such international transfers for the purposes described above. We will ensure that these third parties will be subject to written agreements ensuring

the same level of privacy and data protection as set forth in this Privacy Notice, including appropriate remedies in the event of the violation of your data protection rights in such a third country.

- Whenever we transfer your Personal Data to third parties based outside of the European Economic Area (“EEA”), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.
 - Where we use certain service providers not located in countries with an adequate level of protection as determined by the European Commission, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in the EEA.
 - Please contact us at tofsupport@innplaylabs.com if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.
5. Security. We have implemented and maintain appropriate technical and organization security measures, policies, and procedures designed to reduce the risk of accidental destruction or loss, or the unauthorized disclosure or access to Personal Data appropriate to the nature of such data. The measures we take include:
- Safeguards – The physical, electronic, and procedural safeguards we employ to protect your Personal Data include secure servers, and SSL encryption of data.
 - Access Control – We dedicate efforts for a proper management of system entries and limit access only to authorized personnel on a need to know basis of least privilege rules, review permissions quarterly, and revoke access immediately after employee termination.
 - Internal Policies – We maintain and regularly review and update our privacy related and information security policies.
 - Personnel – We require new employees to sign non-disclosure agreements according to applicable law and industry customary practice.
 - Encryption – We encrypt the data in transit using secure SSL protocols.
 - Database Backup – Our databases are backed up on a periodic basis for certain data and are verified regularly. Backups are encrypted and stored within the production environment to preserve their confidentiality and integrity, are tested regularly to ensure availability, and are accessible only by authorized personnel.

However, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

As the security of information depends in part on the security of the computer you use to communicate with us and the security you use to protect user IDs and passwords, please take appropriate measures to protect this information.

6. Your Rights – How to Access and Limit Our Use of Certain Personal Data.

Subject to applicable law and certain exemptions, and in some cases dependent upon the processing activity we are undertaking, you have certain rights in relation to the Personal Data that we hold about you, as detailed below. We will investigate and attempt to resolve complaints and disputes and make every reasonable effort to honour your wish to exercise your rights as quickly as possible and, in any event, within the timescales provided by applicable data protection laws. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or comply with any of your requests, as detailed below:

- Right of Access. You have a right to know what Personal Data we collect about you and, in some cases, to have such Personal Data communicated to you. Subject to applicable law, we may charge you with a fee. Please note that we may not be able to provide you with all the information you request, and, in such case, we will endeavor to explain to you why.
- Right to Data Portability. If the processing is based on your consent or performance of a contract with you *and* processing is being carried out by automated means, you may be entitled to (request that we) provide you or another party with a copy of the Personal Data you provided to us in a structured, commonly-used, and machine-readable format.
- Right to Correct Personal Data. Subject to the limitations in applicable law, you may request that we update, complete, correct or delete inaccurate, incomplete, or outdated Personal Data.
- Deletion of Personal Data (“Right to Be Forgotten”). If you are an EU Individual, you have a right to request that we delete your Personal Data if either: (i) it is no longer needed for the purpose for which it was collected, (ii) our processing was based on your consent and you have withdrawn your consent, (iii) you have successfully exercised your Right to Object (see below), (iv) processing was

unlawful, or (iv) we are required to erase it for compliance with a legal obligation. We cannot restore information once it has been deleted. Please note that to ensure that we do not collect any further Personal Data, you should also delete our Apps from your mobile devices and clear our cookies from any device where you have used our Apps. We may retain certain Personal Data (including following your request to delete) for audit and record-keeping purposes, or as otherwise permitted and/or required under applicable law.

- Right to Restrict Processing. If you are an EU Individual, you can ask us to limit the processing of your Personal Data if either: (i) you have contested its accuracy and wish us to limit processing until this is verified; (ii) the processing is unlawful, but you do not wish us to erase the Personal Data; (iii) it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise, or defend of a legal claim; (iv) you have exercised your Right to Object (below) and we are in the process of verifying our legitimate grounds for processing. We may continue to use your Personal Data after a restriction request under certain circumstances.
 - Right to Object. If you are an EU Individual, you can object to any processing of your Personal Data which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.
 - Withdrawal of Consent. You may withdraw your consent in connection with any processing of your Personal Data based on a previously granted consent. This will not affect the lawfulness of any processing prior to such withdrawal.

 - Right to Lodge a Complaint with Your Local Supervisory Authority. If you are an EU Individual, you may have the right to submit a complaint to the relevant supervisory data protection authority if you have any concerns about how we are processing your Personal Data, though we ask that as a courtesy you please attempt to resolve any issues with us first.
7. Data Retention.
- Subject to applicable law, we retain Personal Data as necessary for the purposes set forth above. We may delete information from our systems without notice to you once we deem it is no longer necessary for these purposes. Retention by any of our processors may vary in accordance with the processor's retention policy.
 - In some circumstances, we may store your Personal Data for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, audit, accounting requirements and so that we have an accurate

record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data, and whether those purposes can be achieved through other means, as well as applicable legal requirements.

- Please contact us at tofsupport@innplaylabs.com if you would like details regarding the retention periods for different types of your Personal Data.

8. Cookies and Similar Technologies. We use cookies and similar technologies for a number of reasons, including to help personalize your experience on our Site. Third parties through which we provide the Site may be placing and reading cookies on your browser or using web beacons to collect information.

- What are Cookies? A cookie is a small piece of text that is sent to a user's browser or device. The browser provides this piece of text to the device of the originating user when this user returns.
- A "session cookie" is temporary and will remain on your device until you leave the Site.
- A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device until you delete it.
- First-party cookies are placed by us, while third-party cookies may be placed by a third party. We use both first- and third-party cookies.
- We may use the terms "cookies" to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above, such as web beacons or "pixel tags".
- How We Use Cookies. We use cookies and similar technologies for a number of reasons, as specified below. The specific names and types of the cookies, web beacons, and other similar technologies we use may change from time to time. However, the cookies we use generally fall into one of the following categories:

Type of Cookie	Why We Use These Cookies
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Necessary	These cookies are necessary in order to allow the Site to work correctly. They enable you to access the Site, move around, and access different services, features, and tools. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session. These cookies cannot be disabled.
Functionality	These cookies remember your settings and preferences and the choices you make (such as language or regional preferences) in order to help us personalize your experience and offer you enhanced functionality and content.
Security	These cookies can help us identify and prevent security risks. They may be used to store your session information to prevent others from changing your password without your login information.
Performance	These cookies can help us collect information to help us understand how you use our Site, for example whether you have viewed messages or specific pages and how long you spent on each page. This helps us improve the performance of our Site.
Analytics	These cookies collect information regarding your activity on our Site to help us learn more about which features are popular with our users and how our Site can be improved.

Advertising	<p>These cookies are placed in order to deliver content, including ads relevant and meaningful to you and your interests. They may also be used to deliver targeted advertising or to limit the number of times you see an advertisement. This can help us track how efficient advertising campaigns are, both for our own Services and for other websites. Such cookies may track your browsing habits and activity when visiting our Apps and those of third parties.</p>
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- How to Adjust Your Preferences. Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. You may also withdraw your consent for advertising cookies at any time by contacting us at tofsupport@innplaylabs.com.
 - By changing your device settings, you can prevent your device's ad identifier being used for interest-based advertising, or you can reset your device's ad identifier. Typically, you can find the ad identifier settings under "privacy" or "ads" in your device's settings, although settings may vary from device to device. Adjusting your preferences as described in this section herein does not mean you will no longer receive advertisements, it only means the advertisements that you do see will be less relevant to your interests
9. Third-Party Applications and Services. All use of third-party applications or services is at your own risk and subject to such third party's terms and privacy policies.
 10. Communications. We reserve the right to send you service-related communications, including service announcements and administrative messages, without offering you the opportunity to opt out of receiving them. Should you not wish to receive such communications, you may delete the App.
 11. Children. We do not knowingly collect Personal Data from children without parental consent as required under applicable law. In the event that you become aware that a child has been using our Apps without parental permission, please advise us immediately.
 12. Changes to the Privacy Notice. We may update this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business, and we will place any updates on this webpage. Please come back to this page every now and then to make sure you are familiar with the latest

version. If we make material changes to this Privacy Notice, we will seek to inform you by notice on our Site or per email

13. Comments and Questions. If you have any comments or questions about this Privacy Notice or if you wish to exercise any of your legal rights as set out herein, please contact us at tofsupport@innplaylabs.com.