

NRPGames - Privacy Policy

NRPGames respects the privacy rights of our users and is committed to protecting the information collected through “Rifugio - 2 Player Game” and other products (together “Services”). NRPGames has adopted this privacy policy (“Privacy Policy”) to explain how NRPGames collects, stores, and uses the information collected in connection with NRPGames's Services.

NRPGames is a Dutch company. We are committed to comply with all applicable laws and regulations, including the General Data Protection Regulation 2016/679 (“GDPR”).

This Privacy Policy is incorporated as part of the NRPGames Terms of Service, accessible at <https://www.nrpgames.com/uploads/107/TermsOfService%20NRPAapps.pdf>

By using NRPGames’s services, you authorize NRPGames to process your personal data according to this Privacy Policy. If you do not accept the terms of this Privacy Policy, please refrain from using our online games or our games’ online functionalities, our mobile apps and any other online NRPGames products and services.

The Data Controller for our processing of personal data is NRPGames. Should you have any questions relating to this Privacy Policy or our processing of personal data, please contact us at info@nrpgames.com.

1. The purpose and legal ground for the processing

NRPGames collects and processes your personal data for the following purposes:

- A) Review and respond to e-mails
- B) Provide customer and technical support
- C) Managing and providing Services (including user accounts and chat services)
- D) Analyzing usage of the Services
- E) Maintain a server log to prevent misuse or to identify hacking etc.
- F) Maintain, manage and improve our products and to optimize the user experience, and to further develop the Services and other NRPGames services and products
- G) Help diagnose technical and service issues

NRPGames may combine non-personal data with personal data.

NRPGames will only use your personal data for a specific purpose if we have a legally valid ground to do so. The legal grounds that we rely upon and examples of use based on such legal grounds are:

- A) **Performance of a contract:** we rely on this legal ground when we use your personal data in order to maintain and manage your user account and deliver services to you provided in our applications
- B) **Legitimate interests:** we rely on legitimate interest as legal ground when processing is necessary in order to pursue a legitimate interest, e.g. in order to prevent misuse and identify hacking.
- C) **Legal obligation:** sometimes we use your personal data to comply with our legal obligations

NRPGames - Privacy Policy

- D) **Your voluntary and informed consent:** we will process your personal data based on your informed and freely given consent to use your personal data for analytics and diagnosing technical issues and bugs.

2. Personal data that are processed

For purposes of this Privacy Policy, “personal data” means personally identifiable information that specifically identifies or can identify you as an individual.

Likely situations where you make personal data available to NRPGames include, but are not limited to:

- A) entering a username, which represents your user account in our mobile app “Rifugio - 2 Player Game”;
- B) entering a gamename, which you may choose to protect with a password;
- C) use of chat functions in our applications; and
- D) requesting technical support.

The types of personal data may vary depending on the type of activity you are engaged in. The personal data NRPGames may collect and process may include, but are not limited to;

- A) username (we advice you not to use your surname in your username)
- B) IP adress from the network you’re on,
- C) NRPGames Services’ or third party service ID,
- D) gamename
- E) password for a game (Note: although we encrypt your password, which prevents us from seeing it, we do advice you to take extra care when creating a password, e.g. by not using a password you use anywhere else)
- F) information you provide through our chat-services in our applications,
- G) in-game data, such as your game scores, game metrics, achievements, rankings and time played.
- H) e-mail address; and
- I) information you provide when requesting technical support

3. Your rights

In accordance with GDPR, you have a right to access, rectify, erase, object, or restrict processing for all your personal data processed by NRPGames, as well as the right of data portability. You can exercise these rights by writing to NRPGames customer support, via: info@nrpgames.com.

NRPGames will answer your request within a month following the receipt of your demand. In accordance with GDPR, NRPGames reserves the right to extend this delay up to three months if it necessary regarding the complexity of your demand, or based on the number of demands we receive. In such case, we will inform you of this extension within a month following the receipt of your demand.

For any data processing activity requiring your consent you may withdraw your consent at any time. This withdrawal does not affect the lawfulness of any previous processing.

NRPGames - Privacy Policy

You may also address any complaint to the national supervisory authority of your country.

4. Disclosing and transfer of data

NRPGames collects and processes personal data on a voluntary basis and it is not in the business of selling your personal data to third parties. Personal data may, however, occasionally be disclosed in accordance with applicable legislation and this Privacy Policy.

NRPGames may hire agents and contractors (“data processors”) to collect and process personal data on NRPGames’s behalf and in such cases such agents and contractors will be instructed to comply with our Privacy Policy and to use personal data only for the purposes for which the third party has been engaged by NRPGames, according to applicable data processor agreements. These agents and contractors may not use your personal data for their own marketing purposes. Such data processors might be third party service providers such as data analyzers and business intelligence providers.

NRPGames may disclose your personal data to third parties as required by law enforcement or other government officials in connection with an investigation of fraud, intellectual property infringements, or other activity that is illegal. NRPGames may also disclose your personal data to third parties when NRPGames has a reason to believe that a disclosure is necessary to address potential or actual injury or interference with NRPGames’s rights, property, operations, users or others who may be harmed or may suffer loss or damage.

For processing of personal data in relation to NRPGames’s use of analytics see chapters 8 and 9 below.

As NRPGames plans to deliver applications used worldwide, we will store and/or transfer your personal data to our data processors and partners in and outside of EU/EEA member states and the United States in accordance with mandatory legislation and this Privacy Policy.

5. Data retention and correctness

NRPGames retains the data collected pursuant to this Privacy Policy for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Thereafter if the collected data is no longer needed for purposes specified in this Privacy Policy, NRPGames may delete all aforementioned data in its possession. NRPGames does not verify the correctness of personal data.

You are at all times entitled to require the deletion of your personal data by sending an e-mail to info@nrpgames.com. If your account is terminated, either by you or by NRPGames, your personal data will be deleted.

NRPGames - Privacy Policy

If your account is and remains inactive (for example if you have not used the services) for a continued period of 3 years, NRPGames may delete your personal data as well as terminate your account.

Concerning your use of chat services in our applications; chat logs are deleted upon being seen by the recipient.

Even if data is changed or deleted, NRPGames may still retain some of the data to resolve disputes, enforce NRPGames user agreements, offer best possible experience to other users (e.g. ranking data) and comply with technical and legal requirements and constraints related to the security, integrity and operation of Services.

6. Safeguards

NRPGames follows generally accepted industry standards and maintains reasonable safeguards to attempt to ensure the security, integrity and privacy of the information in NRPGames's possession. Only those persons with a need to process your personal data in connection with the fulfillment of their tasks in accordance with the purposes of this Privacy Policy and for the purposes of performing technical maintenance, have access to your personal data in NRPGames's possession.

Personal data collected by NRPGames is stored in secure operating environments that are not available to the public. To prevent unauthorized on-line access to personal data, NRPGames maintains personal data behind a firewall-protected server. However, no system can be 100% secure and there is the possibility that despite NRPGames's reasonable efforts, there could be unauthorized access to your personal data. By using the Services, you accept this risk.

7. Cookies & Advertising

Our NRPGames app's do not host advertisements nor do they place cookies.

8. In-app analytics

NRPGames uses Google Firebase Analytics to measure the usage of our applications. Google is our data processor for Firebase Analytics and NRPGames has entered into a data processing agreement with Google.

Through Firebase Analytics we monitor and collect statistics on usage of our applications. We use data collected through Firebase Analytics to monitor our applications as well as to improve our applications.

We do not use first party cookies or first party identifiers in relation to Google Firebase Analytics, which means that we do not relate data collected through Google Firebase Analytics to users we can identify.

Our implementation of Firebase Analytics is limited to collection and our use of statistical and aggregated data.

NRPGames - Privacy Policy

9. Third party Terms and Conditions

Please note that your access to and use of the Services may be subject to certain third party terms and conditions and privacy policies, including but not limited to application stores, mobile software platforms, on-line gaming platforms, social networking services and payment providers. NRPGames is not liable for any such third party terms and conditions and their use of your personal data.

10. Miscellaneous

Please be aware of the open nature of certain features of the Services NRPGames may make available to you. You may choose to disclose data about yourself in the course of contributing user generated content to the Services. Any Data that you disclose in any of these chats is public information, and there is no expectation of privacy or confidentiality. NRPGames is not responsible for any personal data you choose to make public in any of these forums.

If you are under 16 years of age or a minor in your country of residence, please ask your legal guardian's permission to use or access the Services. NRPGames takes children's privacy seriously, and encourages parents and/or guardians to play an active role in their children's online experience at all times.

In addition, in the event of a merger, acquisition, reorganization, bankruptcy, or other similar event involving all or a portion of NRPGames, NRPGames's customer information may be transferred to NRPGames's successor or assign.

11. Changes to our Privacy Policy

NRPGames reserves the right to modify this Privacy Policy at any time. As a result, please consider checking this Privacy Policy from time to time.

Your use of the Services after NRPGames changed this Privacy Policy shall signify that you agree with these changes. If you do not accept changes made to this Privacy Policy, you shall refrain from using the Services.

Last update: 5 September, 2019