

# PRIVACY POLICY

Effective Date: November 15th, 2021

Thank you for playing our games! This Privacy Policy describes:

- The ways we collect personal data about you and why we do so
- How we use your personal data, and
- The choices you have about your personal data.

This Privacy Policy applies to Supercell's games, store, sites and related services, which we here collectively call the Service. We may periodically update this Privacy Policy by posting a new version on [supercell.com](https://supercell.com). If we make any material changes, we will notify you as required under applicable law, including by posting a notice in the Service prior to the change becoming effective. Your continued use of the Service after the effective date will be subject to the new Privacy Policy.

## CONTACT US

If you have questions about data protection, or if you have any requests for resolving issues with your personal data, we encourage you to primarily contact us through the support features within each Supercell game, so we can reply to you more quickly. Alternatively, you may contact:

Name of the controller: Supercell Oy

Address: Jätkäsaarenlaituri 1, FI-00180 Helsinki, Finland

Attn: Privacy

email: [legal-requests@supercell.com](mailto:legal-requests@supercell.com)

## THE DATA WE COLLECT

The categories of personal data we collect depend on the Services you use, and the requirements of applicable law.

Data you provide us directly.

- Contact information (such as name and email address or phone numbers)
- Player name or tag and password
- Profile information (such as profile photo)
- Your messages and other content you submit when you use the Service (such as chat logs and player support tickets)
- Data you provide in connection with surveys, promotions, sweepstakes, competitions and other events
- Other data you choose to give us (such as when you participate in Supercell Creators or Supercell Make)
- Our payment service providers will collect your payment details in connection with any purchases you make through the Supercell Store

Data we collect automatically.

- Data about your account and game progress, including in most cases an automatically created internal account ID
- Your IP address and mobile device identifiers (such as your device or advertising ID)
- Data about your device, such as device name and operating system, browser type and language, internet service provider, and mobile carrier
- Data we collect with cookies and similar technologies (see more below)
- Approximate location data (as derived from IP address)
- Data about your use of the Service, such as gameplay data, purchases made and your interactions with other players inside the Service

You also have the option to create a Supercell ID using your email address or other contact information.

Data we collect from our partners.

We also use third-party partners, such as social networking sites, data analytics providers and advertising networks to supplement information we have about you, such as:

- Data we receive if you link a third-party tool with the Service (such as LINE, Facebook, WeChat or Kakao)
- Demographic data (such as to determine the coarse location of your IP address)
- Data to fight fraud (such as refund abuse in games or click fraud in advertising)
- Data from platforms that the games run on or data from payment service providers (such as payment verification data)
- Data for advertising and analytics purposes (such as surveys), so we can provide you a better Service
- Data that you have made available to us from a third party service (such as LINE, Facebook, WeChat or Kakao) via your privacy settings

## WHY DO WE COLLECT YOUR DATA

We use your data for a variety of business purposes, such as:

To make the Service work.

To perform the contract, we process data necessary to

- Create accounts and allow you to play our games and use our Service
- Operate the Service
- Verify and confirm payments
- Provide and deliver products and services you request
- Send you Service-related communications

To make the Service more suitable for our players.

To provide a great Service to our players, we have a legitimate interest to collect and process necessary data to

- Update and develop player profiles
- Develop and improve the Service and player experience
- Manage our relationship with you
- Provide social features as part of the Service
- Customize your Service experience
- Respond to your comments and questions and provide player support
- Provide you Supercell offers in the Service as well as in other websites and services (including by email)
- Send you related information, such as updates, security alerts, and support messages
- Enable you to communicate with other players

To show personalized advertisements.

To show you personalized advertisements in the Service and elsewhere (including email) we have a legitimate interest to process necessary data to

- Track the content you access in connection with the Service and your online behavior
- Deliver, target and improve our advertising and the Service

For information on how to opt-out from personalized advertisements, see section 'Your Rights and Options' below.

To keep the Service safe and fair.

Ensuring a level playing field in the Service is a top priority for us. For more information on our acceptable use policy; Supercell Terms of Service.

In order to keep the Service and its social features safe and fair, to fight fraud and ensure acceptable use otherwise, we have a legitimate interest to process necessary data to

- Analyze and monitor use of the Service and its social features
- Moderate chats either automatically or manually
- Take action against fraudulent or misbehaving players

To analyze, profile, and segment.

In all of the above cases and purposes, we may analyze, profile and segment all collected data.

With your consent.

With your consent, we may process your data for additional purposes.

## WHO CAN SEE YOUR DATA

Apart from Supercell, your data can be accessed by others in the following situations:

Other players and users.

Social features are a core component of our games. Other players and users may, for example, see your profile data, in-game activities and read the messages you have posted.

Our service providers.

Supercell has vendors who help us to provide the Service. These vendors process your data only at and according to Supercell's instructions to provide the Service, and perform tasks such as hosting, player support, advertising, analytics and fraud prevention.

Other companies and public authorities.

In order to verify payments (with payment providers such as Paypal) and combat fraud and illegal activity, we may process and disclose data with other companies and organizations and provide it to public authorities in response to lawful requests.

We may also disclose your data based on your consent, to comply with the law or to protect the rights, property or safety of us, our players or others.

Advertising and Social Media partners.

The Service includes features from our partners, such as social media interaction tools, functionalities through application programming interfaces (APIs) or software development kits (SDKs) and in-game advertising. A list of these partners is available at [supercell.com/en/partner-opt-out](https://supercell.com/en/partner-opt-out). These partners may access your data and operate under their own privacy policies. We encourage you to check their privacy policies to learn more about their data processing practices. These partners may access data regarding your activities and your device (such as your IP address, mobile identifiers, page(s) visited, location, time of day). We may also combine and share data we have collected about you with third-party advertising partners. These advertising partners may use this data (and similar data collected from other services) for purposes of delivering targeted advertisements to you when you visit third-party services within their networks. These partners may operate under their own privacy policies. This practice is commonly referred to as "interest-based advertising" or "online behavioral advertising." If you prefer not to share your personal data with third-party advertising partners, you may follow the instructions in "Your Rights and Options" below.

## INTERNATIONAL DATA TRANSFERS

Our Service is global by nature and your data can therefore be transferred to anywhere in the world. Because different countries may have different data protection laws than your own country, we take steps to ensure adequate safeguards are in place to protect your data as explained in this Privacy Policy. Adequate safeguards that we may use include standard contractual clauses approved by EU Commission and other lawful safeguards.

## YOUR RIGHTS AND OPTIONS

Opt out of marketing emails and other direct marketing.

You may opt out of receiving promotional communications, such as marketing emails from us by following the instructions in such communications, or by changing your in-game settings. The updated settings may not be effective immediately. Note that you may still continue to receive non-promotional communications from us, such as communications regarding the Service or updates to our Supercell Terms of Service or this Privacy Policy.

### Push Notifications

We may send you push notifications through our mobile applications. You may at any time opt-out from receiving these types of communications by changing the settings on your mobile device.

### Opt-out of targeted advertising.

You can opt-out of interest-based advertising on mobile applications by checking the privacy settings of your Android or iOS device and turning off "Allow Apps to Request to Track" or selecting "Limit Ad Tracking" (Apple iOS) or "Opt-out of Interest Based Ads" (Android). For more information, see also: [supercell.com/en/partner-opt-out](https://supercell.com/en/partner-opt-out).

You can also opt out from personalized in-game offers through the options provided in the game settings (where applicable).

### Access the personal data we hold about you.

If you request, we will provide you a copy of your personal data in an electronic format.

### Your other rights.

You also have the right to correct your data, have your data deleted, object how we use or share your data, and restrict how we use or share your data. You can always withdraw your consent. We will respond to all requests within a reasonable timeframe. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, you may also contact your local data protection authority within the European Economic Area, Switzerland or UK for unresolved complaints.

If you wish to exercise any of your data subject rights described above, please use the support options described in "Contact Us" above. We will respond to all requests in accordance with applicable laws. To protect your privacy, we may also take additional steps to verify your identity before fulfilling your request, such as by requesting you provide us a purchase receipt or other account information, asking you to link your email address with your game account (for example through Supercell ID), or asking you to answer questions regarding your activities on our Services. Once you have verified your identity, you may also designate an authorized agent to exercise your rights on your behalf by providing the agent's contact information to our customer support staff, as required by applicable law.

You have the right not to receive discriminatory treatment as a result of your exercise of these rights.

## COOKIES AND SIMILAR TECHNOLOGIES

Like most online services, we and our partners use cookies and similar technologies to provide and personalize the Service, analyse use, target advertisements and prevent fraud. Cookies and similar technologies allow us and our partners to store their preferences and track your activities within the Service. Note that our partners may operate under their own privacy policies.

We and our partners collect and store information about users' interactions with unaffiliated websites and applications that use our technologies, including cookies and similar tracking technologies. This allows us to infer the presence of a common user or household behind multiple devices or browsers, for instance, and then link those browsers and devices into a device graph. We do so in order to

- detect and prevent fraud;
- allow users to use the Service on one device and pick up seamlessly where they left off on another device;
- analytics, personalization and attribution;
- limit the number of times a user is shown the same advertisement, across all known or inferred devices; and/or
- provide personalized advertising on each device that is inferred from the browsing patterns on all of the devices.

For more information (including how to opt out), please visit <https://supercell.com/en/partner-opt-out/>. You can disable cookies in your browser settings, but some parts of the Service may then not function properly.

## HOW DO WE PROTECT YOUR DATA

### Security Safeguards.

In order to help ensure a secure and safe player experience, we are continuously developing and implementing administrative, technical and physical security measures to protect your data from unauthorized access or against loss, misuse or alteration.

### Data retention.

We retain your data for as long as your account is active or as needed to provide you the Service. We may for example periodically de-identify unused game accounts, and we may regularly review and de-identify unnecessary data.

Note that if you ask us to remove your personal data, we will retain your data as necessary for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

## CHILDREN

Protecting children's privacy online is very important to us. Generally, our Services are not directed to children under 13 (or other age as required by local law), and the Services do not knowingly collect personal data from children, except as described in the following paragraph. For games that are not directed at children but nonetheless may appeal to them, we take additional steps to limit access to these Services based on the player's age. For these Services, when a player indicates they are under 13 (or the applicable age in their territory), we will limit their access to certain features, such as social media and chat features, as well as certain types of notification alerts. We also limit the processing of personal data to only what is necessary to support the internal operations of our Services.

Please note that for some of our Services we may use a higher age limit (such as 16) than described in the above two paragraphs. We do this to provide a safe game experience for our players and to protect Young Players.

If you are a parent or guardian and wish to review personal data collected from your child, or have that information modified or deleted, you may contact us as described above. If we become aware that a child has provided us with personal data contrary to the above, we will delete any personal data we have collected, unless we have a legal obligation to keep it, and terminate the child's account and/or revert them to the underage experience, as applicable.

## FOR CALIFORNIA RESIDENTS

Please visit [supercell.com/en/disclosure-california-residents](https://supercell.com/en/disclosure-california-residents) for special disclosures pertaining to California residents.