

PRIVACY POLICY

Privacy Policy:

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On the basis of what legal provisions are or may be processed your personal data?

The rules on the protection of personal data (hereinafter referred to as the GDPR) are set out, inter alia, in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance), the country related special acts (lex specialis).

1. "**Personal data**" - means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is a person who can be directly or indirectly identified, in particular on the basis of an identifier such as name and surname, identification number, location data, internet identifier or one or more specific physical, physiological, genetic, mental factors, economic, cultural or social identity of a natural person,
2. "**Processing**" - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction,
3. "**Controller**" - means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law,
4. "**Joint controller(s)**" - Joint controller(s) occurs when at least two Controllers jointly determine the purposes and means of processing, they are Joint controllers (art. 26 GDPR),
5. "**Supervisory authority**" - means an independent public authority which is established by a Member State,
6. "**Recipient**" - means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing,
7. "**Processor**" - means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller,
8. "**Third party**" - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data,

9. "**Third country**" - an entity outside the EEA (European Economic Area) to which personal data is disclosed,
10. "**Consent**" - of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her,
11. "**Privacy Policy**" - this document, presenting information on the principles of personal data processing in accordance with the substantive scope indicated in art. 13 GDPR - information clause regarding the processing of personal data,
12. "**Cookies Policy**" - information on the use of cookies on the website run by the Controller. The Cookie Policy is available on the Controller's website,
13. "**GDPR**" - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (General Data Protection Regulation):
http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/page3g_en/page3g_en?opendocument

Who does this Privacy Policy apply to?

This Privacy Policy (hereinafter referred to as PP) applies to the processing of personal data of natural persons, website users and players. The categories of personal data concerned are natural persons acting alone, natural persons acting on behalf of organizational units without legal personality, natural persons acting on behalf of legal persons (e.g. as members of their bodies, proxies, contact persons), in case of contractual relations this PP applies before the conclusion of a contract and after the conclusion thereof.

Who is the Controller?

Please be advised that Controller is **Fulqrum Publishing Limited**, Papachristoforu Building, 4th, 32 Kritis Street, Limassol, 3087, Cyprus, Tax No.: CY10268076B, Register No.: HE268076.

Contact details to the Controller

Please send inquiries regarding the protection of personal data to the Controller by traditional mail to the above-mentioned address or by e-mail to the address DPO.CY@fulqrumpublishing.com

Data Protection Officer

Please be advised that the Controller has not appointed a Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address: DPO.CY@fulqrumpublishing.com

Information about Joint controllers

1. Please be advised that the Controller runs a fanpage(s) on Facebook (<https://www.facebook.com/FulqrumPublishing/>).
2. Please be advised that in connection with running a fanpage on FB, there is co-administration (Article 26 of the GDPR). The Joint controllers with regard to personal data processed on the fanpage are or may be:
 - 1) Fulqrum Publishing Limited,
 - 2) Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland,
3. Please be advised that the Joint controllers made common arrangements. Information on co-administration and responsibilities is available at: https://www.facebook.com/legal/controller_addendum,
4. Please be advised that regardless of the arrangements made between the Joint controllers, the data subject may exercise his rights under the GDPR with respect to each of the data, Controllers separately,
5. Contact details to the Data Protection Officer:
 - 1) please be informed that the Controller Fulqrum Publishing Limited did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address DPO.CY@fulqrumpublishing.com,
 - 2) contact details to the Data Protection Officer on behalf of Facebook Ireland Limited are available at: <https://www.facebook.com/privacy/explanation>.
6. We hereby inform that due to the co-administration, the supervisory authorities competent for the Controllers are:
 - 1) for Fulqrum Publishing Limited – Office of the Commissioner for Personal Data Protection, contact to the supervisory body is available at: http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument,
 - 2) for Facebook Ireland Limited - Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland: <https://www.dataprotection.ie/>.

For what purposes is or can your personal data be processed?

Personal data is or may be processed for the following purposes:

No.	Purpose of personal data processing	Scope of personal data	Lawfulness of processing
1.	Offers (Personal data processed in connection with the Controller's receipt of an offer regarding possible cooperation)	1) in the case of natural persons: name, surname, position, e-mail address, telephone number, 2) in the case of legal persons: name, surname, position, e-mail, telephone number,	1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,
2.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: name, surname, ID number, position, e-mail address, telephone number, 2) in the case of legal persons: name and surname, position, e-mail address, telephone number,	1) in the case of natural persons: art. 6 (1) b), f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,
3.	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	1) in the case of natural persons: art. 6 (1) b), c), f) GDPR, 2) in the case of legal persons: art. 6 (1) c), f) GDPR,
4.	To conclude an agreement and to provide the service chosen by the User (https://royalquest.com/en/agreements https://royalquest.com/en/agreements/eula)	Name, e-mail,	1) art. 6 (1) b) GDPR - processing necessary to conclude and implement the provisions of the agreement, 2) art. 6 (1) c) GDPR - legal regulations, 3) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
5.	To respond to User queries, feedback or issues including the technical issues (technical support) connected with games (https://royalquest.com/support)	Name, e-mail, description, attachments	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
6.	To send periodic emails, such as updates on new games release dates via e-mail (including Newsletter)	e-mail	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate

			interests pursued by the controller,
7.	To participate in the Forum section on the website (https://royalquest.com/en/forum)	Name, nick, avatar, image, comments,	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
8.	Personal data processed in connection with participation in competitions	Name, surname, telephone number, e-mail address other information connected with participation in competitions	1) art. 6 (1) b) GDPR - processing necessary to conclude and implement the provisions of the contract (acceptance of the provisions of the Regulations), 2) art. 6 (1) c) GDPR - legal regulations (in the case of paid conferences), 3) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
9.	Personal data processed in connection with the exercise of rights in the field of personal data protection	The scope of data necessary to exercise the rights of the person	1) art. 6 (1) c) GDPR - legal provisions, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,
10.	For other purposes - while the content of art. 13 GDPR will then be presented individually for the respective processing purpose	-	-

We hereby inform that depending on the purpose of processing, the scope of the indicated personal data may change.

How long will personal data be processed in accordance with the storage limitation principle (personal data retention)?

Please be advised that personal data are or may be processed for the period of:

No.	Purpose of processing	Lawfulness of processing	Processing period
1.	Offers (Personal data processed in connection with the Controller's receipt of an offer regarding possible cooperation)	1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	a) until objective to processing, b) for internal administrative purposes related to the management

			of the process of receiving offers - for a period of 10 years from the date of receipt of the offer,
2.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: art. 6 (1) b), f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	a) in order to prepare, conclude and implement the provisions of a confidentiality agreement (NDA) - for the duration of the preparation, conclusion and duration of the contract - for an indefinite period or until the contract is terminated or until an objection to the processing is raised, b) for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract (NDA) - if applicable - for the duration of the claims in accordance with applicable law and for the period of their investigation - if applicable, c) for internal management purposes - controlling and archiving documentation in connection with the conclusion of the contract - for a period of 10 years from the date of the contract, which may be changed,
3.	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	1) in the case of natural persons: art. 6 (1) b), c), f) GDPR, 2) in the case of legal persons: art. 6 (1) c), f) GDPR,	a) in order to prepare, conclude and implement the provisions of the contract - for the duration of the preparation, conclusion and duration of the contract - for an indefinite period or until the termination of the contract or until objections to processing are submitted,

			<p>b) in order to make financial settlements - for a minimum period of 6 years from the end of the financial year,</p> <p>c) for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract - if applicable - for the duration of the claims in accordance with applicable law and for the period of their investigation - if applicable,</p> <p>d) for internal management purposes - controlling and archiving documentation in connection with the conclusion of the contract - for a period of 10 years from the date of the contract, which may be changed,</p>
4.	<p>To conclude an agreement and to provide the service chosen by the User https://royalquest.com/en/agreements https://royalquest.com/en/agreements/eula</p>	<p>1) art. 6 (1) b) GDPR - processing necessary to conclude and implement the provisions of the agreement, 2) art. 6 (1) c) GDPR - legal regulations, 3) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,</p>	<p>1) for the duration of the agreement, 2) for the period resulting from legal provisions, 3) until an objection to the processing is submitted, 4) for a period of 10 years for internal administrative purposes,</p>
5.	<p>To respond to User queries, feedback or issues including the technical issues (technical support) connected with games https://royalquest.com/support</p>	<p>1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,</p>	<p>1) until an objection to the processing is submitted, 2) until the technical support is submitted, 3) for a period of 10 years for internal administrative purposes,</p>
6.	<p>To send periodic emails, such as updates on new games release dates via e-mail (including Newsletter)</p>	<p>1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for</p>	<p>1) until the consent is withdrawn, 2) until an objection to the processing is submitted,</p>

		the purposes of the legitimate interests pursued by the controller,	3) for an indefinite period,
7.	To participate in the Forum section on the website (https://royalquest.com/en/forum)	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) until the consent is withdrawn, 2) until users stop using the Forum, 3) for the period resulting from legal provisions, 4) for a period of 10 years for internal administrative purposes,
8.	Personal data processed in connection with participation in the competitions	1) art. 6 (1) b) GDPR - processing necessary to conclude and implement the provisions of the contract (acceptance of the provisions of the Regulations), 2) art. 6 (1) c) GDPR - legal regulations (in the case of paid conferences), 3) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) until an objection to the processing is submitted, 2) for the duration of the competitions, 3) for the period of 6 years after the participation in the competitions, 4) for a period of 10 years for internal administrative purposes,
9.	Personal data processed in connection with the exercise of rights in the field of personal data protection	1) art. 6 (1) c) GDPR - legal provisions, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) for the period resulting from legal provisions (for an indefinite period), 2) until an objection to the processing is submitted,

Please be advised that the given periods of personal data processing for individual processing purposes may change, among others, as a result of amendments to the law or internal organizational changes.

Under what circumstances is the provision of personal data a statutory or contractual requirement or a requirement necessary to enter into a contract?

Please be advised that providing personal data is:

No.	Purpose of processing	Lawfulness of processing	Processing
1.	Offers	1) in the case of natural persons: art. 6 (1) f) GDPR,	a) providing personal data is voluntary, and failure to

	(Personal data processed in connection with the Controller's receipt of an offer regarding possible cooperation)	2) in the case of legal persons: art. 6 (1) f) GDPR,	provide personal data will result in the inability to read and make a decision in connection with the received offer for cooperation,
2.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: art. 6 (1) b), f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	a) processing of personal data in order to prepare, conclude and implement the provisions of a confidentiality agreement (NDA) - providing personal data is contractual, and failure to provide personal data will result in the inability to prepare, conclude and implement the provisions of the contract, b) processing of personal data for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract (NDA) - it is voluntary, and failure to provide personal data will result in the inability to pursue claims,
3.	Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)	1) in the case of natural persons: art. 6 (1) b), c), f) GDPR, 2) in the case of legal persons: art. 6 (1) c), f) GDPR,	a) processing of personal data in order to prepare, conclude and implement the provisions of the contract - providing personal data is contractual, and failure to provide personal data will result in the inability to prepare, conclude and implement the provisions of the contract, b) in the case of financial settlements, it is of a statutory nature and failure to provide personal data will result in the inability to meet the obligations arising from

			the applicable law on the Controller, c) processing of personal data for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract - it is voluntary, and failure to provide personal data will result in the inability to pursue claims,
4.	To conclude an agreement and to provide the service chosen by the User (https://royalquest.com/en/agreements https://royalquest.com/en/agreements/eula)	1) art. 6 (1) b) GDPR - processing necessary to conclude and implement the provisions of the agreement, 2) art. 6 (1) c) GDPR - legal regulations, 3) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) is of a contractual nature, but failure to provide personal data will result in the inability to conclude and perform the provisions of the agreement, 2) is of a statutory nature, and failure to provide personal data will result in the inability to meet the legal provisions imposed on the Controller,
5.	To respond to User queries, feedback or issues including the technical issues (technical support) connected with games (https://royalquest.com/support)	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) is voluntary, and failure to provide personal data will result in the inability to respond the queries or providing the technical support,
6.	To send periodic emails, such as updates on new games release dates via e-mail (including Newsletter)	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) is voluntary, and failure to provide personal data will result in the inability to prepare periodic emails, such as updates on new games release dates via e-mail, including Newsletter
7.	To participate in the Forum section on the website (https://royalquest.com/en/forum)	1) art. 6 (1) a) GDPR - consent of the data subject, 2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	1) is voluntary, and failure to provide personal data will result in the inability to participate in the Forum
8.	Personal data processed in connection with participation in the competitions	1) art. 6 (1) b) GDPR - processing necessary to conclude and implement the provisions of the	1) is voluntary, but failure to provide personal data will result in the inability

		<p>contract (acceptance of the provisions of the Regulations),</p> <p>2) art. 6 (1) c) GDPR - legal regulations (in the case of paid conferences),</p> <p>3) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,</p>	<p>to participate in the competitions,</p> <p>2) is of a contractual nature, but failure to provide personal data will result in the inability to participate in the competitions (in the event of the existence of the Rules of Participation in the competitions),</p> <p>3) is of a statutory nature, and failure to provide personal data will result in the inability to meet the legal provisions imposed on the Controller (in the case of organizing a paid competitions),</p>
9.	<p>Personal data processed in connection with the exercise of rights in the field of personal data protection</p>	<p>1) art. 6 (1) c) GDPR - legal provisions,</p> <p>2) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,</p>	<p>1) is voluntary, and failure to provide personal data will result in the inability to exercise the rights of the person in the field of personal data protection,</p> <p>2) is of a statutory nature, and failure to provide personal data will result in the inability to comply with the provisions of the law in the area of personal data protection imposed on the Controller,</p>

Processing of personal data based on the consent of the data subject

Please be advised that in the case of processing personal data based on the consent of the data subject (Article 6 (1) (a) of the GDPR):

No.	Purpose of processing	Lawfulness of processing	Art. 6 (1) a) GDPR
1.	To send periodic emails, such as updates on new games release dates via e-mail (including Newsletter)	1) art. 6 (1) a) GDPR - consent of the data subject,	The data subject has the right to withdraw their consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Withdrawal of the consent granted should be reported to the e-mail

			address: DPO.CY@fulgrumpublishing.com
2.	To participate in the Forum section on the website (https://royalquest.com/en/forum)	1) art. 6 (1) a) GDPR - consent of the data subject,	The data subject has the right to withdraw their consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. Withdrawal of the consent granted should be reported to the e-mail address: DPO.CY@fulgrumpublishing.com

The processing of personal data based on the legitimate interest pursued by the Controller (processing is necessary for the purposes of the legitimate interests pursued by the controller)

Please be advised that in the case of processing personal data based on the legitimate interest pursued by the Controller (Article 6 (1) f) of the GDPR processing is necessary for the purposes of the legitimate interests pursued by the controller):

No.	Purpose of the processing	Lawfulness of the processing	Art. 6 (1) f) GDPR
1.	Offers (Personal data processed in connection with the Controller's receipt of an offer regarding possible cooperation)	1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	Please be advised that for the legitimate interest pursued by the Controller: a) with regard to the processing of personal data in order to become acquainted with the cooperation offer, a binding business relationship shall be considered, b) the processing of personal data for internal administrative and managerial purposes related to the management of the process of receiving offers is considered,
2.	NDA (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the confidentiality agreement (NDA))	1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,	Please be advised that in the case of processing personal data of natural persons and natural persons representing or acting on behalf of a legal person, the legitimate interest pursued by the Controller is considered to be:

			<p>a) processing in order to prepare, conclude and implement the provisions of a confidentiality agreement (NDA),</p> <p>b) processing for purposes related to the investigation of claims between the parties to the contract for the performance of the provisions of the contract (NDA) - if applicable - the legitimate interest pursued by the Controller is the processing of personal data for the purpose of seeking claims for the implementation of the provisions of the contract (NDA),</p> <p>c) processing for internal management purposes - the legitimate interest pursued by the Controller is the control and archiving of documentation in connection with the conclusion of the contract,</p>
3.	<p>Arrangement (Personal data processed in connection with the preparation, conclusion and implementation of the provisions of the contract)</p>	<p>1) in the case of natural persons: art. 6 (1) f) GDPR, 2) in the case of legal persons: art. 6 (1) f) GDPR,</p>	<p>Please be advised that in the case of processing personal data of natural persons, natural persons representing or acting on behalf of a legal person, the legitimate interest pursued by the Controller is considered to be:</p> <p>a) processing in order to prepare, conclude and implement the provisions of the contract,</p> <p>b) processing for the purpose of financial settlements - activities related to the monitoring and payment of payments,</p> <p>c) processing for purposes related to the investigation between the parties to the contract of claims arising from the performance of the</p>

			provisions of the contract - if applicable - the legitimate interest pursued by the Controller is the processing of personal data for the purpose of seeking claims for the implementation of the provisions of the contract, d) processing for internal management purposes - the legitimate interest pursued by the Controller is the exercise of control and archiving of documentation in connection with the conclusion of the contract,
4.	To conclude an agreement and to provide the service chosen by the User (https://royalquest.com/en/agreements https://royalquest.com/en/agreements/eula)	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	The legitimate interest of the controller is the processing of personal data in order to administrative and internal management issues also in case of the claims - if applicable
5.	To respond to User queries, feedback or issues including the technical issues (technical support) connected with games (https://royalquest.com/support)	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	The legitimate interest of the controller is the processing of personal data in order to providing the technical support, administrative and internal management issues also in case of the claims - if applicable
6.	To send periodic emails, such as updates on new games release dates via e-mail (including Newsletter)	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	A legally legitimate interest is considered to be a binding relationship, including a business relationship, an ongoing contract with the data subject and data processing for internal administrative purposes, also in relation to the exercise of the rights of data subjects in connection with the possibility of exercising the rights of persons to whom data concern and provided for by law (e.g. documenting withdrawal of granted consent),

7.	To participate in the Forum section on the website (https://royalquest.com/en/forum)	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	The legitimate interest of the controller is the processing of personal data in order to administrative issues related to running the Forum, for administrative and internal management issues also in case of the claims - if applicable
8.	Personal data processed in connection with participation in the competitions	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	The legitimate interest of the controller is the processing of personal data in order to administrative issues related to running the competitions, for administrative and internal management issues also in case of the claims - if applicable
9.	Personal data processed in connection with the exercise of rights in the field of personal data protection	1) art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller,	A legally legitimate interest is to the exercise of the rights of data subjects in connection with the possibility of exercising the rights of persons to whom data concern and provided for by law and demonstrate the compliance with the GDPR regulations,

Disclosure of personal data by the Controller

We hereby inform that personal data is or may be disclosed by the Controller:

- 1) disclosed to data recipients providing services to the Controller pursuant to **art. 28 GDPR** – Data Processing Agreement. Depending on the purpose of personal data processing, the categories of data recipients may be: IT infrastructure providers (software and hardware), website hosting, tools for conducting meetings, conferences, online webinar, external recruiting companies. The list of the processors to whom the Controller entrusts the processing of personal data is available at the request of the data subject,
- 2) disclosure of data **to recipients cooperating with the Controller**. Depending on the purpose of personal data processing, the categories of recipients to whom personal data may be disclosed are entities operating in the field of audits, postal services, courier services, law offices. We would like to inform you that after disclosing personal data, the data recipient becomes the Controller. The list of recipients to whom the Controller discloses personal data is available at the request of the data subject,
- 3) disclosure of data **to recipients who are public / state authorities**. Depending on the purpose of personal data processing, the categories of data recipients may be such bodies

as the Tax Office, Police, courts, the Supervisory Authority or other entities to which the Controller discloses personal data under applicable law. Please be advised that after disclosing personal data, their recipient becomes the Controller of the data. The list of recipients to whom the Controller discloses personal data is available at the request of the data subject,

- 4) disclosure of personal data **to third parties**. The list of third parties to whom the Controller discloses personal data is available at the request of the data subject.

Transferring personal data to a third country (i.e. outside the EEA)

1. Please be advised that personal data may be transferred to a third country, i.e. outside the EEA. In the event of transferring personal data outside the European Economic Area, such transfer may only take place on the terms set out in Chapter V of the GDPR:
 - 1) pursuant to art. 45 GDPR - transfer based on an adequacy decision,
 - 2) pursuant to art. 46 GDPR - transfer subject to appropriate safeguards, including the use of standard data protection clauses adopted by the European Commission,
2. We hereby inform that the transfer of personal data outside the EEA may involve the risk of not ensuring sufficient security of personal data. In the event of a risk related to the transfer of personal data outside the EEA, the Controller provides such information in this Privacy Policy,
3. Please be advised that the list of entities outside the EEA to which the Controller discloses personal data is available at the request of the data subject,
4. List of entities that may transfer personal data outside the EEA, which may not provide sufficient protection of personal data provided for in the GDPR:

No.	The name of the entity	Link to information	The risk related to the transfer of data outside the EEA and the negative effects that may arise for the data subject
1.	Facebook	https://www.facebook.com/legal/terms	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
2.	LinkedIn	https://www.linkedin.com/legal/user-agreement	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
3.	Twitter	https://twitter.com/en/tos#intlTerms	1) unauthorized access to data, 2) loss of control over your data,

			3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
4.	YouTube	https://www.youtube.com/t/terms	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
5.	Google	https://policies.google.com/terms?hl=en&gl=be	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
6.	Google Maps	https://www.google.com/intl/en_be/help/terms_maps/	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,

What are the rights of the data subject?

We would like to inform you about the right to request the Controller to exercise the following rights:

- 1) the right to access personal data relating to the data subject,
- 2) the right to rectify personal data,
- 3) the right to delete personal data (erasure of personal data),
- 4) the right to limit the processing of personal data (restriction of processing),
- 5) the right to object to the processing,
- 6) the right to transfer data (the right to data portability),
- 7) the right to receive a copy of your personal data,
- 8) the right to lodge a complaint with the supervisory body.

Please be advised that due to the individual purposes of processing listed in this Privacy Policy, the exercise of the rights of data subjects may be fully or partially limited, e.g. due to applicable law, which obliges the Controller to process them. Please send inquiries regarding the protection of personal data to the Controller by traditional mail to the above-mentioned address or by e-mail to the address: DPO.CY@fulgrumpublishing.com.

Who is the supervisory authority?

1. We would like to inform you about the right to lodge a complaint to the supervisory body, Office of the Commissioner for Personal Data Protection, contact to the supervisory body is available at: http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument
2. In the case of co-administration with Facebook Ireland Limited, we would like to inform you that the supervisory body is Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland (as amended): <https://www.dataprotection.ie/>.

Information on automated decision making, including profiling

Please be advised that by entering the Controller's website, you are not subject to automated decision making, including profiling. Information on the data cookies used by the Controller is available in the Cookie Policy available on the website as a separate document: <https://royalquest.com/en/agreements/cookie>.

What is the source of the data?

Personal data may:

- 1) come directly from the data subject,
- 2) come indirectly from the data subject. The source of personal data may be publicly available registers. Personal data may come from a legal entity that provides personal data of persons designated on behalf of the legal entity to represent it or to contact it, or to implement the provisions concluded between the parties.

What scope of personal data is processed?

The Controller processes personal data to the extent necessary to achieve the purposes of processing indicated in the Privacy Policy. In accordance with the principle of minimization, we process only the scope of personal data necessary to achieve the purpose of processing.

How do we secure personal data?

Please be advised that in order to protect privacy and personal data, the Controller has implemented appropriate physical, technical, organizational and legal measures to ensure the security of personal data processing and to ensure the implementation of the rights and freedoms of natural persons.

Processing of personal data using social media or platforms

1. Please be advised that the Controller runs or can run a fanpage(s) on social media or platforms runs:
 - a) Facebook,
 - b) LinkedIn,
 - c) Twitter,
 - d) YouTube,
 - e) VK,
2. Please be noted that the Controller is responsible for the processing of personal data only to the extent to which he decides about the purposes and means of processing personal data via the fanpage,
3. Please be advised that using the above-mentioned fanpage, information on the processing of personal data is available at the following links:

No.	Entity name	Link to information
1.	Facebook	https://www.facebook.com/legal/terms
2.	LinkedIn	https://www.linkedin.com/legal/user-agreement
3.	Twitter	https://twitter.com/en/tos#intlTerms
4.	YouTube	https://www.youtube.com/t/terms
5.	VK	https://connect.vk.com/privacy

References to other sites

1. Please be advised that the website of the Controller may contain references to other websites (e.g. business partners cooperating with the Controller).
2. Please be advised that the Controller is not responsible for the processing of personal data of other websites. Information on the processing of personal data is made available by the Controllers to which the abovementioned websites belong.

Processing of personal data via sales platforms

1. Please be advised that the Controller, as part of cooperation with sales platforms, may process personal data in connection with the offer of products and services.
2. Information on the processing of personal data to the extent to which the Controller determines the purposes and means of the processing of personal data, is available in the dedicated Privacy Policy provided by the Controller on the sales platform - if applicable.

Personal data breach notifications

We hereby inform that pursuant to Art. 34 GDPR, in the event of a breach of personal data protection that may result in a high risk of violation of the rights or freedoms of natural persons, the Controller shall notify the data subject of such a personal data breach without undue delay. Please be advised that pursuant to Art. 34 GDPR, personal data may be processed in connection with the personal data breach referred to above. Please be noted that the legal basis for the processing of personal data is art. 6 sec. 1 lit. c) GDPR. Please be advised that in the event of a personal data breach, the Controller will take all possible and available technical and organizational measures to meet the requirements set out in art. 33 and art. 34 GDPR.