

Privacy Policy

Last updated: June 29, 2018

Dodreams Oy respects your right to privacy. This Privacy Policy explains how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Policy applies to personal information that we collect through our games, like the Drive Ahead! mobile game ("**Games**") and websites, like www.dodreams.com ("**Website**"). Games and Website is jointly called the "**Services**".

If you use our Services, you agree to this Privacy Policy and processing of your personal information in accordance with this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Services.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

What personal information we collect and where?

We collect the following categories of personal information about you through the Services:

- *Information that you provide voluntarily*

Certain parts of our Services may ask you to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to begin playing Games, to subscribe to marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Specifically, the information we collect directly from you may include information like (i) your name; (ii) your email address, phone number and other contact information; (iii) your user name or any other name you use to identify yourself in any Services; and (iv) other personal information required in order to help you with any queries or support matters you may need assistance with via our forums or customer support service.

- *Information that we collect automatically*

When you use our Services, we may collect certain information automatically from your device. This information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, advertising identifiers, operating system, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how you use the Services and how your device has interacted with our Services, including the Games played and the pages of our Website accessed.

Collecting this information enables us to better understand the players of our Games and visitors who come to our Website, where they come from, and what content or features on our Games and Website is of interest to them. We use this information to serve interest-based advertising to you, for our internal analytics purposes, to prevent fraudulent behaviour in our Services and to improve the quality and relevance of our Services to our players and visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

- *Information that we obtain from third party sources*

We may receive personal information about you from third party sources, like sign-in and social networking services.

You can log in to our Games using sign-in services such as Apple Game Center or Google Play. We warmly recommend that you use these sign-in services. Otherwise it may be impossible for us to help you to transfer your game progression to your new device. If you choose to use these sign-in services, we receive and process your account ID number and user name of the sign-in service.

Our Games may also include some social media interaction tools.

Why we process your personal information and on what legal basis?

We collect and use your personal information for the following purposes. Our legal basis for collecting and using the personal information is also described below.

- *For the performance of the contract between us and you*

For the performance of the contract we collect necessary personal information to

- create accounts and user profiles and allow players to play our Games and use our Services;
- verify and confirm payments;
- provide and deliver products and services you request; and
- send you related information, including confirmations and administrative messages.

- *To provide you with optimal Games and Services*

To customize and provide you with optimal Games and Services we have a legitimate interest to collect and process necessary personal information to

- update and develop user profiles;
- operate our Games and Services;
- analyse, develop and improve Games, other Services and user experience;
- manage our relationship with you;
- identify and suggest connections with other users of our Games;
- respond to your comments and questions, resolve the problems and provide other kind of player support;
- analyse, profile and customize your use of the Games and Services;
- provide you our offers in our Games and Services as well as in other web sites and services, or by email;
- send you related information, including technical notices, updates, security alerts, and support and administrative messages;
- enable you to communicate with other players; and
- link or combine information with other information we get from third parties, to help understand your preferences and provide you with better services.

- *Show you personalized advertisements*

Subject to your consent (asked through the Games), to show you personalized advertisements (so called behavioural ads) in our Games and Services as well as in other web sites and services, or by email we collect and use necessary personal information to

- track the content you access when you use our Games or your device, and other online behaviour;
- use cookies, advertising identifiers, or similar tracking technologies; and
- deliver, enable, target and optimize advertising and promotional information.

You can revoke your consent anytime from the settings of our Games. You can also "opt out" of targeted advertising from your mobile device's settings. Please note that if you decide not to give your consent or choose to "opt out", it does not mean that you will no longer receive advertising. It just means that the advertising you see displayed will not be customized to you and your interests and may be less relevant to you.

- Prevent fraud and ensure acceptable use of our Services

To identify, prevent, and investigate fraud and provide a fair, equal and enjoyable game experience to players, we have a legitimate interest to collect and process necessary personal information to

- analyse use of Games and Services and the behaviour of players to detect frauds and other misbehaviour;
- determine accounts or players connected to fraudulent schemes or other misbehaviour; and
- take actions against fraudulent or misbehaving players.

Please note that our Services offer communication methods like chats or community forums. You need to be aware that any information you provide by these means (also your chat text) is monitored and may be read, collected, and used by others who access the information, for example, other players and us.

Whit whom do we share your personal information with?

We may disclose your personal information to the following recipients or categories of recipients:

- **Advertising and social media partners** who use advertising identifiers, cookies, APIs, and/or SDKs in our Services to enable them to collect and analyse user and device related data and information. These partners are listed below, and they can use your personal information and other data for their own purposes. These partners operate under their own privacy policies. We encourage you to check those privacy policies to learn more about their data collection and use practices, use of cookies and other similar tracking technologies. The opt-out instructions for these Partners' services are also included in their privacy policies. These are the partners who collect personal information through our Services and use the information according to their own policies:

In-game advertisements (subject to your consent):

- **MoPub** (a division of Twitter, Inc. and Twitter International Company), <https://www.mopub.com/legal/privacy/>
- **Unity Ads (Finland)**, <https://unity3d.com/legal/privacy-policy>
- **AdColony**, <https://www.adcolony.com/privacy-policy/>
- **Ironsource**, <https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>
- **AdMob**, <https://policies.google.com/privacy?hl=en>
- **Vungle**, <https://vungle.com/privacy/>
- **Tapjoy**, <https://www.tapjoy.com/legal/#privacy-policy>
- **Facebook Audience Network**, <https://www.facebook.com/about/privacy/>

Other marketing and social media:

- **Everyplay**, <https://unity3d.com/legal/privacy-policy>
- **Our services providers and subcontractors** who process your information only on our behalf and according to our instructions. These partners provide data processing services to us, for example, to provide (i) data hosting, (ii) marketing and advertising services, (iii) player support, (iv) analytics for Games and Services as well as (v) development and maintenance;
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and
- to a **potential or actual buyer** (and its agents and advisers) in connection with any proposed or actual purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Policy.

Cookies and similar tracking technology

Like most games and online services, we and our partners use advertising identifiers, cookies and similar tracking technologies. Advertising identifiers, cookies and similar technologies are used by us and our partners to provide our Services to you and to collect data from your device. These technologies allow us and our partners to (i) recognise you and your device; (ii) provide interest-based advertising to you; (iii) prevent fraud, (iv) allow our Services to interact with a third party social network or platform (where you have chosen to allow such interaction); (v) allow our payment processors to process your payment instructions; and (vi) enable us and third parties to provide you with more customized services, for example to provide our Services in the correct language (subject to availability). You can limit ad tracking, reset advertising identifiers and disable cookies from your device or browser settings.

You may also see our own advertisements in other games and services. If you click such advertisements and install our Game(s), we may share a device identifier with our partners to verify installs and prevent fraudulent actions.

How do we keep your personal information secure?

We use appropriate technical and organisational measures designed to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include that only those of our employees, who on behalf of their work are entitled to process personal information, are entitled to use a system containing personal information. Each user has a personal username and password to the system. The information is collected into databases that are protected by firewalls, passwords and other technical measures. The databases and the backup copies are in locked premises and can be accessed only by certain pre-designated persons.

International data transfers

Our Services are global by nature and therefore your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses or other similar arrangements (such as the Privacy Shield certification regarding transfers to United States) for transfers of personal information between us and our third-party service providers and partners located outside the European Union or European Economic Area.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). Unnecessary and outdated personal information will be erased or anonymized in connection with the periodical reviews and also at other times when deemed necessary.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update, request deletion, object to processing or restrict processing** of your personal information, you can do so at any time by contacting us. The same applies to portability requests.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you.
- To the extent we have collected and process your personal information based on your consent (as the legal basis), then you can **withdraw your consent** at any time. This can be done from the

settings of our Games. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. If you have any inquiries or requests related to the above rights, please contact us at euprivacy@dodreams.com.

For requests concerning erasing or sending you a copy of your personal data, please include the necessary IDs which can be found inside the game by following these instructions.

Instructions for obtaining necessary IDs in “Drive Ahead!”:

- Launch Drive Ahead!.
- Navigate to the settings menu by clicking on the gear icon.
- Click on the info button in the lower right corner of the settings menu and you will see a popup message containing the necessary information.
- Under the information, there is a copy button. Click on it to copy the text onto the clipboard and paste it into the email with your request.

Instructions for “Drive Ahead! Sports“:

Erasing your personal data:

- You can erase your personal data from the settings menu, by going to privacy policy settings and scrolling down to press the "Erase all data" and clicking "yes". This will erase the data from our Firebase.
- Erasing the data from UnityAds happens through the UnityAds, you can find that in the UnityAds privacy policy linked to this document.

Requesting your personal data:

- Follow the instructions from the UnityAds privacy policy to get the data from them, according to their policy, the request has to come from the user.
- Copy you private data identifiers from the settings menu by going to the privacy policy settings and clicking the copy to clipboard button. Email these to us with the information about what kind of request it is.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.

Special Note About Children’s Privacy

We comply with all applicable laws that are designed to protect children’s privacy, such as the GDPR and the Children’s Online Privacy Protection Act (“**COPPA**”).

For clarity, our Games are not intended to children under 13 years of age, therefore no one under 13 years of age is allowed to use or access the Games or provide any personal information to us. We do not

knowingly collect or solicit personal information from or direct or target behaviourally targeted advertising to anyone under 13 years of age or knowingly allow such persons to use or access our Games. If you are under 13 years of age, please do not send any information about yourself to us including your name, address, telephone number, or email address.

If we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under the age of 13, please contact us using the contact details provided under the “How to contact us” heading below.

If we learn that we have inadvertently gathered personal information from children under 13 years of age, we will dispose of that information, or otherwise treat it in accordance with COPPA and other applicable laws and regulations. If you are a parent or guardian and you believe that your child under 13 years of age has provided us with personal information, please contact us using the contact details provided under the “How to contact us” heading below.

How to contact us?

The data controller is Dodreams Oy, business ID 2729470-7.

Address; Kaivokatu 8B, 00100, Helsinki, Finland

Email: contact@dodreams.com