

# Privacy Policy - English translation.

**This is an automated translation, its purpose is merely informative. Only the documents in the official languages of the State are legal.**

## 1. Introduction

**Welcome to "wedge – the game"!**

We, the wedge group Sàrl, attach great importance to the protection of your privacy and your personal data. The following privacy policy informs you about how we handle information collected during your use of our app "wedge – the game" and the associated services. This declaration is an integral part of our terms of use and is intended to give you a clear understanding of what data we collect, how this data is used and what control options you have as a user.

### **Scope**

This privacy policy applies to all users of the app "wedge – the game" and covers the collection, processing and use of personal data that arises when using our app and the associated services.

### **Data collection and processing**

Scope of data collection: We collect personal data that is necessary to provide our services. This includes data that you provide to us when registering, purchasing premium content or using the app functions.

**Purpose of data processing:** The data collected is used to provide you with a smooth, efficient and personalized user experience. This includes improving our app, providing customer support and processing transactions.

**Data security:** We use modern security technologies and procedures to protect your data from unauthorized access and misuse.

**Data sharing:** Your data will not be passed on to third parties without your express consent, except in cases where this is required by law or necessary to provide our services.

## **Your rights**

As a user, you have the right to receive information about the data stored about you, to correct it, to delete it or to restrict its processing. You can also object to the processing of your data and have the right to data portability.

## **Contact and questions**

If you have any questions, comments or concerns about our data protection practices, please contact us using the contact channels provided in the app.

## **2. Name and address of the controller**

The controller, in accordance with the General Data Protection Regulation (GDPR) and other national data protection laws of the member states as well as other data protection provisions, is:

wedge group Sàrl

Rue du Vully 20

CH-2000 Neuchâtel

Switzerland

E-mail: [support@wedge.vip](mailto:support@wedge.vip)

Website: [www.wedge.vip](http://www.wedge.vip)

## **3. Legal basis for the processing of personal data**

As part of our data processing practices, we rely on various legal bases set out in the EU General Data Protection Regulation (GDPR) to ensure the lawful processing of personal data:

### **Consent (Art. 6 Para. 1 lit. a GDPR):**

If we obtain explicit consent from you, the data subject, to process your personal data, this is done on the basis of Art. 6 Para. 1 lit. a GDPR.

This consent is voluntary and can be revoked by you at any time. The effectiveness of the data processing carried out on the basis of the consent until the revocation remains unaffected by the revocation.

**Contract fulfillment and pre-contractual measures (Art. 6 Para. 1 lit. b GDPR):**

Art. 6 Para. 1 lit. b GDPR serves as the legal basis for the processing of personal data that is necessary to fulfill a contract in which you are involved as the data subject.

This also includes the processing of data that is necessary for the implementation of pre-contractual measures, such as inquiries before concluding a contract.

**Fulfillment of legal obligations (Art. 6 Para. 1 lit. c GDPR):**

If the processing of personal data is necessary to fulfill a legal obligation to which our company is subject, the processing is carried out on the basis of Art. 6 Para. 1 lit. c GDPR.

This refers to legal requirements that our company must meet in the course of its business activities.

**Protection of vital interests (Art. 6 Para. 1 lit. d GDPR):**

In situations in which the processing of personal data is necessary to protect the vital interests of the data subject or another natural person, Art. 6 Para. 1 lit. d GDPR serves as the legal basis.

This can be relevant in emergency situations or in the event of immediate danger.

**Protection of legitimate interests (Art. 6 Para. 1 lit. f GDPR):**

If processing is necessary to protect the legitimate interests of our company or a third party, and these interests do not outweigh the interests, fundamental rights and freedoms of the data subject, we rely on Art. 6 Para. 1 lit. f GDPR.

In doing so, we carefully weigh the interests between our company and your rights as a data subject.

These legal bases form the foundation of our commitment to protecting your data and to ensuring transparent, lawful processing of your personal information.

#### 4. Data deletion and storage period

The personal data of the data subject will be deleted or anonymized as soon as the purpose of storage no longer applies. In addition, such storage may take place if this is provided for by EU law or the laws of the member states to which we are subject. Data will also be deleted or anonymized if the storage and deletion periods specified in the above-mentioned laws expire, provided that no further storage of the data is necessary for the conclusion or fulfillment of a contract.

#### 5. Data security

The wedge group Sàrl makes every reasonable effort to prevent unauthorized access to your personal data, as well as the unauthorized use or falsification of this data, and to minimize the associated risks. Nevertheless, the provision of personal data, whether in person, by telephone or over the Internet, always involves risks and no technological system is completely free from the possibility of being manipulated or sabotaged.

The wedge group Sàrl processes the information collected from you in accordance with German, Swiss and European data protection law. All employees are obliged to comply with data confidentiality and data protection regulations and are instructed in this regard. Your data is transmitted in encrypted form using the SSL procedure.

#### 6. Provision of the app; creation of log files

When using our mobile app "wedge - the game", available in the Appstore and Playstore, we collect and process a range of personal and technical data from our users. This data collection is essential for the provision and optimization of our services. We store and keep the following information confidential:

1. Users' date of birth: For age verification and legal compliance.
2. User registration date: To document the start of using our services.
3. User email: For communication and account management.
4. Users' username: For identification in the app.
5. Encrypted user password: To ensure account security.
6. Users' parental information: For minors, to comply with child protection laws.
7. Users' gender: To personalize the user experience (if specified).
8. Visibility of users' bets/bids: To manage interactions.

9. User-created bets: To document user activity.

10. User-placed bids: To track participation.

11. User's number of tokens: To manage game status and in-app currency.

12. Technical data:

- Internet protocol and IP address,
- Device type, including screen resolution, screen size and pixel density,
- Name, version and language of the device's operating system,
- Marketing ID (IDFA or GAID), if authorization has been granted,
- Store identifier (e.g. Game Center ID or Google Play ID),
- Date and time of access to the app,
- Amount of data transferred,
- Access status (e.g. success or failure of the loading process),
- Duration and frequency of use of the app.

The collection and processing of this data is carried out in accordance with the applicable data protection regulations. We undertake to use this data only for the purpose for which

## 7. Purpose of data processing

In order to ensure a smooth delivery of our services to your PC or mobile device, wedge geoup Sàrl stores your IP address for the duration of your session. This storage serves to maintain the functionality and security of our services. In addition, your IP address and log files are stored to ensure the functionality of our services, to optimize our website and app, and to protect the security of our information technology systems.

### **Storage and use of IP addresses and log files:**

We reserve the right to store IP addresses and log files in order to monitor compliance with our terms of use and rules.

In cases of violations of the terms or in the event of legal disputes, this data will be used to prevent, investigate or clarify cases of abuse in the context of legal proceedings.

If necessary, we can pass this data on to investigative authorities to support legal proceedings.

### **Anonymization and deletion:**

Any analysis of the data is carried out anonymously wherever possible in order to protect your privacy.

After the storage period has expired, the IP address and the log files are deleted unless there are statutory retention obligations or specific criminal investigations or abuse proceedings are ongoing.

### **Transparency and data protection:**

The wedge group Sàrl is aware of the importance of data protection and is committed to treating all data collected in accordance with the applicable data protection laws.

Users have the right to obtain information about the data stored about them and can request the deletion or correction of this data.

The storage and processing of your data by wedge group Sàrl is always carried out in strict compliance with the applicable data protection regulations in order to ensure a high level of security and confidentiality.

## **8. Storage period of the data**

The data is deleted as soon as it is no longer required to fulfil the purpose for which it was collected. In the event that data is collected for the purpose of providing the services, this is the case when the respective session has ended.

Log files containing personal data are usually deleted after seven days at the latest, unless

- there are error logs that enable us to correct errors in the game, in which case the data is deleted after 30 days, or
- there are violations of the terms of use, in which case the data is stored for up to 2 years, or for the entire duration of the legal dispute, whichever is later.

After this period has expired, the IP address and log files are deleted unless there are mandatory statutory retention periods or specific criminal proceedings are pending.

## 9. Possibility of objection and deletion of data

The collection of data for the purpose of providing the services and the storage of the data in log files is essential for the operation of the website. As a result, there is no possibility of objection on the part of the user. Furthermore, in the case of error logs and violations of the terms of use, there is no possibility of asserting an objection or the deletion of the log files. This decision is based on Art. 21 Para. 1 No. 1 and Art. 17 Para. 3 lit. f GDPR.

## 10. Inquiries via contact form, e-mail, support tool; legal matters

### 1. Description and scope of data processing

At wedge group Sàrl, we take the protection of your personal data seriously. If you contact us via our app or other communication channels, we process your data to answer your inquiries and offer you the best service. This includes cases where your request requires processing by our legal department, for example in the case of litigation or legal matters.

#### **a) Contact via the app:**

Within our app we offer various ways to contact us, such as a contact form or an integrated support tool.

The following data is collected and stored:

Name,

Email address,

Message content,

IP address,

Date and time of sending.

This data is used exclusively to process your request and is not passed on to third parties.

#### **b) Legal matters:**

If your request requires the involvement of our legal department, we process relevant data that is necessary to process the matter. This may include:

Player ID and username,

Country of registration,

Details of the games you use,  
Full name, age and date of birth (if provided),  
ID or passport number (if provided),  
Email address,  
Order history and payment information,  
All communication with the support team,  
Ban history and reasons for them.

## **2. Purpose of data processing**

The processing of your personal data enables us to process your inquiries efficiently, whether in the context of customer support or legal matters. In the case of legal questions, we process your data to process legal claims, fulfill legal obligations and support our business units in legal processes.

## **3. Legal basis for data processing**

The processing of your data is based on various legal bases:

Art. 6 Para. 1 lit. f GDPR for legitimate interests,  
Art. 6 Para. 1 lit. b GDPR for contract performance,  
Art. 6 Para. 1 lit. c GDPR for fulfilling legal obligations.

## **4. Storage period of the data**

The storage period of your data depends on the purpose for which it was collected. Data that is required for legal matters is stored in accordance with the relevant limitation periods or statutory retention periods.



## **5. Possibility of objection and deletion of data**

You have the right to object to the processing of your data at any time. If you wish to have your data deleted, you can send us a corresponding request. Please note that in certain cases, particularly in the event of ongoing legal disputes, the processing of your data may be necessary.

## **11. Ads/Advertising**

In our app "wedge - the game" we use Google Ads to provide you with personalized advertising. These advertising measures allow you to collect tokens that you can use within the app. Our goal is not only to create a user-friendly experience through this advertising, but also to expand the app's functionality for our users.

### **Purpose and method of data processing:**

Google Ads presents you with advertisements based on your previous interactions, usage behavior and preferences.

This personalized advertising is designed to provide you with relevant and interesting offers, making using the app more attractive for you.

The processing of your data enables us to show you advertising that is better tailored to your needs and thus offer you tokens for app use more effectively.

### **Protection of minors:**

We take the protection of minors very seriously and take measures to ensure that the advertising placed via Google Ads is suitable for minors and age-appropriate.

Our app is not aimed at children and young people under the age of 18 and we do not permit the use of the app by anyone under the age of 18. We do not have verified age verification, but we do not knowingly collect personal information from children.

We recommend that parents and guardians monitor their children's online activities -

### **Google privacy information:**

For detailed information about data collection, processing and use by Google Ads, please refer to Google's privacy policy, which you can view at <https://policies.google.com/privacy>.

Google offers various options for managing your privacy settings, allowing you to exercise control over the way your data is used for advertising purposes.

**Legal basis for data processing:**

The data processing by Google Ads is based on a legitimate interest in accordance with Art. 6 (1) (f) GDPR. This interest lies in the effective provision of our services and the possibility of providing you with additional tokens through advertising.

Your consent to data processing is implied by continued use of the app and viewing the advertisement.

**Storage period and data processing:**

The data collected by Google Ads is stored for as long as it is necessary to provide the advertising services and to fulfil the associated purposes.

We are committed to protecting the data collected and ensuring that it is only used for the specified purposes.

**Your rights and control:**

As a user of our app, you have various rights regarding the processing of your data. These include the right to information, correction, deletion and restriction of the processing of your personal data.

You also have the right to object to the processing of your data at any time, especially if you do not agree with the type of advertising or the use of your data for advertising purposes.

## 12. GooglePay Inapp Purchases

In our app "wedge - the game" we offer you the option of purchasing tokens via Google Play in-app purchases. This feature allows you to use additional content or services within our app. Below we explain how we handle the data related to in-app purchases:

### **Processing of in-app purchase data:**

If you make an in-app purchase via Google Play, certain information is transmitted to us by Google Play in order to process the purchase.

This information includes your Google Play username, the fact of the purchase, the purchase amount and the specific content or tokens purchased.

### **Purpose of data processing:**

The transmitted data is used exclusively for the purpose of completing the purchase, providing the purchased content or tokens and for billing.

We also use this information to ensure that you have access to the content or tokens you have purchased and to process support requests related to your purchases.

### **Legal basis:**

The processing of this data is carried out on the basis of the fulfilment of the contract in accordance with Art. 6 Paragraph 1 Letter b of GDPR, as the data processing is necessary for the provision of the purchased services.

### **Storage period:**

The data is stored for as long as it is necessary to process the purchase and provide the purchased services.

In addition, the data is stored in accordance with the statutory retention periods and obligations.

**Data protection and security:**

We take all necessary measures to ensure the security and protection of your data in connection with in-app purchases.

Your data will be treated confidentially and will not be passed on to third parties unless this is necessary to process the purchase or due to legal requirements.

**User rights:**

You have the right to receive information about the data stored about you and to correct, delete or restrict its processing.

You also have the right to object to the processing of your data at any time.

**Cooperation with Google Play:**

We would like to point out that Google Play has its own data protection regulations that apply to the processing of your data during the purchase process.

For more information, we recommend that you view Google Play's privacy policy.

By using the in-app purchase option in our app "wedge - the game", you agree to the processing of your data to the extent described. Our goal is to offer you a secure and convenient purchasing option while protecting your data protection rights.

## 13. Use of RevenueCat

Our app "wedge - the game" uses RevenueCat as a powerful middleware to optimize and manage in-app purchases and subscriptions via Google Play. This integration allows us to provide a seamless purchasing experience while simplifying the management of user subscriptions and transactions.

**Enhanced data processing by RevenueCat:**

In addition to collecting and processing transaction data, RevenueCat may also collect information about usage behavior related to the purchases made.

This may include tracking usage statistics and patterns to evaluate and improve the effectiveness of our offers.

**Customization and personalization:**

The data collected by RevenueCat allows us to personalize and customize the purchasing experience in the app. This enables us to provide offers and content that are better suited to your interests and needs.

**RevenueCat privacy policy:**

RevenueCat has its own privacy policy that describes how the company collects, processes and protects data.

RevenueCat's privacy policy can be found at <https://www.revenuecat.com/privacy>. This policy gives you detailed information about RevenueCat's data processing operations.

**Use and sharing of data:**

RevenueCat uses the data collected to help us manage the in-app purchases. In addition, RevenueCat may use this data for internal analysis purposes to improve its services.

The data will not be shared with third parties unless it is necessary to provide the service or required by law.

**Security measures and data protection commitments:**

RevenueCat is committed to taking appropriate security measures to protect your data from loss, misuse and unauthorized access.

We work closely with RevenueCat to ensure that your data is treated in accordance with applicable data protection laws and standards.

**Cooperation with users:**

We recognize that you may have questions about RevenueCat's data processing. We strive to communicate transparently and answer all your inquiries in this regard.

You can exercise your data protection rights at any time, including the right to information, rectification, erasure of your data or objection to certain processing activities.

The integration of RevenueCat into our app "wedge - the game" is an essential part of our commitment to offer you an efficient and pleasant shopping experience. We always take care to protect your privacy and process your data securely and responsibly.

## 14. Use of SendGrid for email communication

We use SendGrid, a renowned provider of email marketing and communication solutions, to send emails as part of our services. SendGrid helps us to ensure efficient and reliable email communication with our users.

**Processing of email data by SendGrid:**

SendGrid processes email addresses and other relevant information on our behalf that is necessary for sending and managing emails. This includes the content of the email, the date and time of sending, and the recipients' interaction data with the emails (such as openings and clicks).

The data processing includes the technical processing of email sending, the analysis of user behaviour, and the optimization of our email communication.

**Purpose of data processing:**

The use of SendGrid enables us to send you personalized and relevant information, be it in the form of newsletters, notifications, or specific service messages.

It also serves to analyse and optimize our email campaigns in order to improve our communication with you and make it more relevant.

**Legal basis:**

The processing of your email data via SendGrid is based on your consent (Art. 6 Para. 1 lit. a GDPR) or our legitimate interest in efficient and effective communication (Art. 6 Para. 1 lit. f GDPR).

**SendGrid privacy policy:**

For information on how SendGrid processes and protects your data, please refer to SendGrid's privacy policy, which you can view at <https://www.twilio.com/legal/privacy>.

SendGrid strives to maintain high data protection standards and is committed to protecting your personal information.

**Storage period and disclosure:**

The data processed via SendGrid is stored for as long as it is necessary to achieve the purposes stated above or until you withdraw your consent.

Your data will be used exclusively for the purposes stated and will not be passed on to third parties without your express consent.

**Your rights:**

You have the right to receive information about your data stored by us, to correct it or to delete it. You also have the right to object to the processing of your data and to withdraw your consent to data processing.

You can contact us at any time to exercise your rights or if you have any further questions about data processing by SendGrid.

The use of SendGrid in our app reflects our commitment to providing you with professional and secure email communication. We take the protection of your personal data seriously and take all necessary measures to process it in accordance with applicable data protection laws.

## 15. Data transfer to Switzerland

As a Swiss company, wedge group Sàrl directs its services to users in various countries, including Germany. This requires the transfer and processing of personal data to Switzerland, which is done taking into account both Swiss and European data protection regulations.

### **Basis of data transfer:**

By using our services, users agree to the transfer of their personal data to Switzerland.

Switzerland offers a level of data protection that is considered adequate by the European Commission. This means that your data will be processed in Switzerland under similarly strict data protection conditions as in the EU.

### **Application of terms from the GDPR:**

In our privacy policy, we use terms from the EU General Data Protection Regulation (GDPR) that may differ from those of the Swiss Data Protection Act (DSG).

However, this use is not intended to imply a restriction of users' rights under the Swiss DSG. Rather, it aims to provide a clear and understandable picture of our data protection practices that is relevant to both EU citizens and users in Switzerland.

### **Swiss Data Protection Act (DSG):**

The Swiss DSG protects personal data and guarantees the rights of those affected, including the right to information, correction and deletion of data.

We are committed to treating all personal data in accordance with the provisions of the DSG and to ensuring the security and confidentiality of this data.

### **Transparency and data protection:**

We attach great importance to providing transparent information about our data processing practices.

Our privacy policy explains in detail how we collect, process and protect personal data.



**User rights:**

Users have the right to receive information about their data stored by us at any time, to correct it or to delete it.

We also enable users to object to the processing of their data and to withdraw their consent to data processing at any time.

**Data security and compliance:**

We take all necessary technical and organizational measures to ensure the security of your data, especially during transmission and storage in Switzerland.

Our data protection practices are regularly reviewed and adjusted to ensure compliance with the Swiss DSG and the GDPR.

**International data protection standards:**

By combining the principles of the GDPR and the DSG, we strive to comply with the highest data protection standards and to inform our users about all aspects of data processing.

The processing of personal data always takes into account the privacy of our users and in accordance with the applicable legal requirements.

**Information obligation and communication:**

If there are significant changes to our data protection practices, users will be fully informed in order to ensure ongoing transparency.

We are available to our users to answer any questions regarding the processing of their data and to provide support with data protection-related concerns.

**Summary and Commitment:**

In summary, wedge group Sàrl strives to ensure a high level of data protection and security for all users, regardless of whether they are from the EU or Switzerland.

We are committed to respecting the privacy of our users and to processing all personal data responsibly and in accordance with applicable data protection laws.

By using our services, you acknowledge and agree that your data will be processed in accordance with the provisions of the Swiss DSG and the GDPR. We are proud to offer you services that are not only functional and user-friendly, but also respect your privacy and data rights.

## 16. Updates

wedge group Sàrl reserves the right to change, add to or replace this privacy policy at any time. Changes will be made in accordance with applicable data protection laws and regulations. Our goal is to always protect your data appropriately while ensuring that our data protection practices are current and effective.

### **Publication of changes:**

All changes to our privacy policy will be published on our website at <https://privacy.xxxgmbh.com>.

We will also inform you of material changes by means of a prominent notice in our services or by direct notification.

In order to continue to use our services, you may be required to confirm your consent to the revised privacy policy.

### **Effect of the revised policies:**

Any revised version of the privacy policy replaces all previous versions and is effective from the day of its publication.

Continued use of our services after a revised privacy policy is published is deemed confirmation of your consent to the changes made therein.

### **Additional transparency and information:**

In the event of material changes, in particular those that involve new processing purposes or significant changes in the way data is processed, we will ensure that you are adequately informed.

We also offer you the opportunity to ask questions and receive further information about changes to our data protection practices.

Your rights:

*We remind you that you have the right to obtain information about the data stored about you, to correct it, to delete it or to limit its processing.*

*You can also object to the processing of your data at any time.*

*The wedge group Sàrl is committed to protecting your privacy and managing your personal data responsibly. We recommend that you regularly review our privacy policy to stay informed of any changes.*