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We are glad that you trusted us and provided us with your personal information. We would like to assure you that we will take all reasonable measures to protect your personal information. Below you will find information about our processing of your personal data (collectively referred to as the "**Privacy Policy**") when:

- a) you use the Wedge the Game app,
- b) You enter into an electronic service contract with us,
- c) you contact Us using the contact information available within the application or provide Us with your information so that We can contact you about a specific issue,

1. Administrator

1.1. The controller of the personal data processed in accordance with this Privacy Policy is **Wedge Group Sàrl, based in Neuchâtel** with registration number: CHE-471.969.431, address: Rue du Vully 20, CH-2000 Neuchâtel, Switzerland (hereinafter referred to as "**Administrator**" or "**We**").

1.2. You can contact us regarding data protection issues:

- a) in person or by regular mail at - Rue du Vully 20, CH-2000 Neuchâtel, Switzerland,
- b) via email to: support@wedge.vip.

2. Purposes and grounds for processing your personal data

We will process your personal data collected by us in the situations indicated in this Privacy Policy for the following purposes:

- a) to respond to inquiries sent to us at the contact information address provided as part of the application - based on our legitimate interest as an Administrator - on the basis of Article 6(1)(f) of the RODO,
- b) to analyze how you use our application and improve its performance and security, and to analyze how you use our social media accounts - based on our legitimate interest as an Administrator - on the basis of Article 6(1)(f) of the RODO,
- c) to assert and defend against claims before and outside the courts and administrative bodies - based on our legitimate interest as an Administrator - on the basis of Article 6(1)(f) of the RODO,
- d) To conclude a contract for the provision of services by electronic means - based on the necessity of processing for the performance of the contract - on the basis of Article 6(1)(b) of the RODO,
- e) settlement of contracts concluded with you - based on the performance of the Administrator's legal obligation under tax and accounting regulations - on the basis of Article 6(1)(c) RODO,
- f) Data archiving and backup - in connection with the obligation imposed on us as the Data Controller to properly secure the data and based on our legitimate interest - on the basis of Article 6(1)(f) of the RODO,
- g) To comply with the legal obligation to enable reporting of Illegal Content - based on Article 6(1)(c) of the DPA in conjunction with Article 16 of the DSA,
- h) Handling complaints by persons making a report of Illegal Content or persons affected by a report of Illegal Content against our decisions on such reports - based on Article 6(1)(c) of the DPA in conjunction with Article 20 of the DSA,
- i) transfer of Personal Data to courts, law enforcement or other public authorities for the purpose of complying with legal or regulatory requirements in the event of receipt of a lawful request or the existence of a legal obligation to transfer Personal Data to the aforementioned entities- based on Article 6(1)(c) of the RODO in conjunction with Article 18 of the DSA.

3. Data processed for contact purposes - scope of processing

3.1. If you choose to contact us using our email addresses, telephone numbers or traditionally by mail or in person, and in situations where we have the right to contact you (e.g., you have directed us to make a request to contact you on a particular matter), we will process personal data that you provide to us or that is necessary for us to respond to your request (including identification and contact information), or that we have in connection with the relationship between us or that we have collected from publicly available sources.

3.2. We process this data because it is necessary for the purposes of legitimate interests pursued by us, i.e. in particular:

- i. in order to respond to the message sent to us and further contact you,
- ii. in order to respond to your request to get in touch with you on a specific issue,

- iii. for the purpose of archiving and backing up data in connection with the obligation imposed on us as a Controller to adequately protect data,
- 3.3. Providing personal information is voluntary, but may be necessary to answer your question and/or contact you.

4. Data processed in connection with the use of the application - scope of processing

- 4.1. When you use the app, we record data such as your IP address, the type and version of device and browser you are using, your region, your app settings, choices you have made regarding cookies, and how you use the app. In most cases, we will not be able to identify you as a user, and this data will be anonymous to us. However, in situations where we are able to associate them with you, which may be the case if we have additional data from another source (e.g. you are logged into the app), they will become your personal data for us. We process this data:
- a) for the purpose of providing electronic services in terms of providing users with access to content collected in the application - on the basis of necessity for the performance of the contract for the provision of electronic services,
 - b) due to the fact that they are necessary for the purposes of the legitimate interests pursued by us, i.e. in particular:
 - i. customize the way the application is displayed and personalize it,
 - ii. saving data from forms to maintain sessions and facilitate the use of the application,
 - iii. Analyze the use of the application to improve its performance and protect against abuse.
- 4.2. Providing personal data is voluntary, but may be necessary to use our application and its functionality.
- 4.3. We also use third parties as part of the application. As a general rule, they will be our processors, but in some limited cases they may process your personal data as a separate controller. This may include data about your use of our app that has first been anonymized or aggregated and does not directly identify you. This may happen when you start using our app and consent to cookies placed by a third party within our app (based on your consent) or when you engage in further interaction with us, such as by contacting us or becoming our customer (based on our legitimate interest or the legitimate interest of a third party). The purpose of third party processing (in addition to providing services to us) is to operate certain functions of third party products and services whose solutions and services we use (which is a legitimate interest of the third party).

5. Data processed in connection with the conclusion and performance of contracts for the provision of electronic services - scope of processing

- 5.1. As part of the use of the application, the user has the option to enter into an electronic service agreement:
- a) applications;
 - b) user accounts;
 - c) games, and
 - d) Advertisements.

- 5.2. The scope of processing of personal data in connection with the conclusion and performance of the contract for the provision of electronic application service is the same as the scope of processing indicated in paragraph 4 of the Privacy Policy.
- 5.3. As part of the conclusion and performance of the contract for the provision of electronic services in the form of a user account, the Administrator processes such data as:
- a) email address,
 - b) invented username,
 - c) gender,
 - d) date of birth,
 - e) invented password associated with the account,
 - f) image if the user has chosen to set their own photo as their profile picture,
 - g) Selection of preferences within the operation of the user account,
 - h) Information about the tokens held by the user,
 - i) information about the course of games that the user has created or participated in.
- 5.4. As part of the conclusion and performance of the contract for the provision of an electronic service in the form of a game, the Administrator will process personal data relating to the status of a given user's game, as well as personal data that the user voluntarily provides in the course of creating a game question. The user should not, in the course of creating questions for the game, provide personal data of third parties, unless the user has a valid basis for processing to provide such data.
- 5.5. As part of the conclusion and performance of a contract for the provision of an electronic advertising service, the Administrator will process personal data provided to it by the provider of Google Ads software in order to personalize the advertisement displayed. The Google Ads software allows us and our marketing partners to tailor the advertising within the electronic advertising service to the keywords you are searching for, if you have consented to this within a given search. The data controller for Google Ads is Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland. We recommend that you read Google's privacy policy available at: <https://policies.google.com/privacy>.
- 5.6. We process your personal data in the context of the conclusion and execution of contracts for the provision of electronic services:
- a) To conclude and perform concluded agreements for the provision of services by electronic means - based on the necessity of processing to conclude and perform the agreement - on the basis of Article 6(1)(b) of the RODO;
 - b) settlement of contracts concluded with you - based on the performance of the Administrator's legal obligation under tax and accounting regulations - on the basis of Article 6(1)(c) of the DPA;
 - c) to assert and defend against claims before and outside the courts and administrative bodies - based on our legitimate interest as an Administrator - on the basis of Article 6(1)(f) of the RODO,
 - d) Data archiving and backup - in connection with the obligation imposed on us as the Data Controller to properly secure the data and based on our legitimate interest - on the basis of Article 6(1)(f) of the RODO.
- 5.7. Provision of personal data is voluntary, but failure to do so will prevent the conclusion of the contract for the provision of electronic services.

6. Data processed in connection with cooperation with our Suppliers and Contractors - scope of processing

- 6.1. In the event that the Administrator enters into cooperation with its Suppliers and Contractors, it processes the personal data of their designated representatives and staff members who enter into contracts on their behalf, who are involved in the performance of these contracts and who are contacted by the Administrator as part of this cooperation.
- 6.2. Accordingly, if you are a representative or staff member of our Supplier or Contractor, we will process your personal data provided by your employer or principal: first name, last name, the company for which he or she works or performs orders, position and contact information.
- 6.3. We process this data:
- a) for the performance and settlement of the concluded contract - on the basis of the necessity of the processing for the performance of the contract (Article 6(1)(b) of the DPA) or on the basis of our legitimate interest consisting in the proper performance of contractual obligations;
 - b) for the purpose of establishing and maintaining good business relations with your employer or principal - based on our legitimate interest in maintaining business relations with our Suppliers and Contractors (Article 6(1)(f) RODO);
 - c) for archiving purposes, to the extent necessary to comply with legal requirements, in particular those under tax and accounting regulations - based on our legitimate interest in preserving evidence related to the conclusion or performance of a contract with our Supplier or Contractor (Article 6(1)(f) RODO);
 - d) for the purposes of potentially establishing, investigating or defending against claims - based on our legitimate interest in protecting and asserting our rights (Article 6(1)(f) RODO).
- 6.4. Providing personal data is voluntary, but may be necessary, for example, to perform a contract or to contact you.

7. Data processed in connection with Illegal Content - scope of processing

- 7.1. If the Administrator becomes aware that the services provided through our website or application include content that may constitute Illegal Content within the meaning of the DSA, the Administrator may process the personal data of the persons making notifications and complaints related to such Content and the users who uploaded/accessed such Content:
- a) Name, surname of the applicant/complainant,
 - b) email address,
 - c) data on the entity on behalf of which the notifier/complainant is acting and its position (if applicable),
 - d) other data provided in the application or complaint,
 - e) IP address and data contained in the content submitted or published by the user through the website or application to which the report or complaint relates
- 7.2. We process this data:
- a) in order to comply with the legal obligation to allow reporting of Illegal Content - based on Article 6(1)(c) of the DPA in conjunction with Article 16 of the DSA,
 - b) for the purpose of considering appeals by persons making a report of Illegal Content or persons affected by a report of Illegal Content against our decisions

on such reports- based on Article 6(1)(c) of the DPA in conjunction with Article 20 of the DSA,

- c) for the purpose of transferring Personal Data to courts, law enforcement agencies or other public authorities in order to comply with legal or regulatory requirements in the event of receipt of a lawful request or the existence of a legal obligation on the part of the Administrator to transfer Personal Data to the aforementioned entities - based on Article 6(1)(c) of the DPA in conjunction with Article 18 of the DSA,
- d) for the purpose of potentially establishing, investigating or defending against claims - based on our legitimate interest in protecting and asserting our rights (Article 6(1)(f) RODO).

7.3. When making a report of Illegal Content or filing a complaint, providing data is a legal obligation. Failure by the applicant/complainant to provide personal data may also result in the inability to process the report or complaint.

8. How long will we process your personal data?

Your personal data will be processed:

- a) for the purpose of contacting you - from the date of their collection and for as long as we can reasonably be expected to continue the conversation,
- b) for the purpose of investigating and defending against claims - for a period not exceeding the period of limitation of claims;
- c) in order to comply with obligations imposed by law - for a period no longer than necessary to demonstrate that these obligations have been fulfilled by the Administrator;
- d) to improve the operation and security of the application for as long as the data are necessary for this purpose, but no longer than until you effectively object to their processing
- e) for archiving and backup purposes - for the period determined in accordance with the Administrator's backup and archiving policy;
- f) for the purpose of performance and settlement of contracts concluded with Suppliers and Contractors - for the period of performance and settlement of the contract, including the period for the assertion of claims and the retention of documentation relating to the performance of obligations imposed by law;
- g) for the purpose of establishing and maintaining business relationships with Suppliers and Contractors - for the duration of such relationships;
- h) for purposes related to a report made that there is Illegal Content in the services provided through our website or application - until the expiration of the time limit for filing a complaint regarding the content covered by such report, and if a complaint has been filed, until we are informed of the decision made on the complaint,
- i) on the basis of your consent - until it is withdrawn, but this does not affect the correctness of the Administrator's processing of personal data before its withdrawal,
- j) based on the legitimate interest of the Administrator - for the duration of this interest, but no longer than until you make an effective objection to such processing.

9. Recipients of Data

We exercise due diligence in selecting the entities to which we transfer your data; we require these entities to protect your data with appropriate technical and organizational measures. Your personal data may only be disclosed to:

- a) to third parties providing services to us that are necessary to fulfill the purposes for which we process your personal data (e.g. IT services, electronic communications, hosting, improving sales and customer service);
- b) To recipients to whom the data must be disclosed on the basis of applicable laws or decisions of a court or other authority;
- c) to other recipients if you agree to disclose the data to them or if the transfer to them is necessary to protect your vital interests or those of other individuals or for the common good.

10. Transfer of data to third countries

10.1. Your personal data may be transferred outside the country where the Administrator is based. In case of transfer of your personal data to third countries (located outside the European Economic Area), which do not provide the same level of protection of personal data, the Administrator undertakes to protect the privacy and confidentiality of your personal data. In such a situation, the Administrator will provide an appropriate legal basis for the transfer of data, as well as appropriate legally required measures to protect such data.

10.2. Due to the location of the Administrator, your personal data will be transferred to Switzerland. By virtue of Decision 2000/518/EC of July 26, 2000 under Directive 95/46/EC of the European Parliament and of the Council on the adequate protection of personal data in Switzerland, this country has been recognized as a so-called adequate country meeting an adequate level of data protection. Therefore, the transfer of your data to the Administrator's headquarters in Switzerland does not require your consent.

11. Links to external websites

For your convenience, the Administrator's application may contain links to external websites or information. When you use these links, you will leave the Administrator company's application and be redirected to a Third Party website. We have no control over third-party websites, and the data protection practices of these third parties may differ from ours. We do not endorse the content available on Third Party websites, nor do we make any representations with respect to those websites. If you submit your personal data through a third party website, this Privacy Policy will not apply to the third party's processing of that data. We encourage you to read the privacy policy of the website or company in question before providing your personal information.

12. Rights of data subjects

With respect to any of the following rights, you may contact Us using the details provided in paragraph 1 of this Privacy Policy.

- a) **The right to be informed, to access your data and to receive a copy of your data.** You may at any time request information about your personal data that we store or to which we have access. Upon your request, a copy of your personal data under processing will be provided to you free of charge. We will be able to charge a fee for sending you each subsequent copy of your data to cover the reasonable costs of handling your request.
- b) **Right to withdraw consent.** Whenever you are processed on the basis of your consent, you may withdraw this consent at any time, and this fact does not affect the lawfulness of the processing that was carried out before the withdrawal of consent.
- c) **Right to rectification of personal data.** We make reasonable efforts to ensure that your personal information is correct, complete and up-to-date. If it is necessary to update this data, please let us know.
- d) **Right to data portability.** You have the right to receive your personal data in a structured, commonly used machine-readable format, as well as the right to transfer your data to another data controller - in case the legal basis for the processing of such data is your consent.
- e) **The right to erasure and restriction of data processing.** You may request the deletion of your personal data **in the** cases specified in the data protection regulations. However, this is not an absolute right - there may be situations in which we are still entitled to process the data. You can also request that we restrict further processing of your data.
- f) **Right to object to processing.** In cases specified by law, you may object to further processing of your data if the basis for such processing is our legitimate interest.
- g) **The right to file a complaint with a supervisory authority.** You can file a complaint with the supervisory authority for the protection of personal data - as a rule, this will be the President of the Office for Personal Data Protection.

COOKIES AND SCRIPTS

What are cookies and scripts?

Cookies and scripts are small text files stored on your device when you use the application and any other similar technologies, such as pixel tags or local storage, used to collect information about your activity on the application (hereinafter collectively referred to as "**Cookies**"). Cookies may come from the Administrator or from the Administrator's trusted partners. Cookies are not used to process or store personal data and, by design, are not used to directly identify you. They also do not change the configuration of your device. Exceptional situations when the data collected through Cookies may be considered as your personal data, as well as your related rights, are described in detail in the relevant part of the Privacy Policy.

What are cookies used for?

We use Cookies primarily to allow you to access and use the application. The Administrator also uses Cookies for analytical and marketing purposes. We may also use other technologies and technical solutions to access information stored on your device.

What types of Cookies are used in the application?

1. The Administrator uses the following types of Cookies in the Application:
 - a) Necessary Cookies - are installed to provide you with access to application and its basic functions. They do not require your consent. Without them, the Administrator would not be able to provide services on the site to users.
 - b) Functional - allow us to remember your preferences and choices (such as username, language, text size or other customizable items) and provide you with personalized content within the app.
 - c) Analytical - allow to check the number of visits and sources of traffic in the application. They help identify which pages are more or less popular, and understand how users move through the application, so the Administrator can improve application performance.
 - d) Marketing - we use them to deliver advertisements according to your interests and preferences. Based on the information in these Cookies and activity on other sites, a profile of your interests is built.

Does the site use Third Party Cookies?

When using the application, you may receive Cookies from third parties cooperating with the Administrator. Third parties cooperating with the Administrator on the application are:

- a) Analytics providers - in order to better understand the performance of the Service, we work with analytics providers such as:
 - I Google Analytics
 - II Google Tag Manager
 - III Facebook
- b) Marketing Partners - The Administrator uses marketing vendors who may use Marketing Cookies to display advertisements that they believe will be of most interest to you, and to measure the effectiveness of such advertisements on the Application. Our marketing partners are:
 - I Google Ads

- c) Functional service providers - in order to allow you to customize the use of the application to your needs, we work with telecommunications service providers such as:

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How long are cookies stored?

The application uses:

- a) Session Cookies - some Cookies are temporary files, stored until you exit the application. These types of Cookies help analyze web traffic, enable identification and resolution of technical problems, and make it easier to navigate the application;
- b) "Permanent" Cookies - part of the Cookies are "permanent" Cookies that are stored for the time specified in their parameters or until you delete them. They help us remember your settings and preferences to make your next visit more convenient or to provide you with tailored content.