

PRIVACY STATEMENT - PLAYTEST

1. GENERAL INFORMATION

Poki is committed to protecting the privacy of everyone who uses our websites and applications. This privacy statement – the “Privacy Statement – PLAYTEST”, or just in short “Privacy Statement” – is designed to provide transparency into Poki’s privacy practices and principles. It provides information on the data that we collect from website visitors who consented to a Playtest on the Poki.com web platform.

The Poki Website is owned and operated by Poki B.V. (referred to in this Privacy Statement as “Poki”, “we”, “our”, or “us”). Poki is an entity incorporated under the laws of the Netherlands.

2. WHICH DATA IS USED AND FOR WHAT PURPOSES?

Poki offers a feature to the developers we work with to enable them to improve their game. This feature will enable a developer to see the activity of a player while the player is playing the developer’s game. This feature is called a “Playtest”. In the Playtest, a developer is ‘connected’ to a random player. That player will receive a pop-up asking for consent before the feature is enabled.

While performing the Playtest, information is shared from a player to Poki. Please also note that Poki only stores the Playtest data for a maximum of 30 days. Please find directly below information about the processing of your data during a Playtest. If you would like more information on Poki’s privacy practices in general, please refer to our [Privacy Statement](#) and [Cookie Statement](#).

The Poki Playtest

We offer the possibility to developers to perform a Playtest. In this feature the developers receives the game activity of a random player after the player has consented to the Playtest. The developer can replay the game activity after the player is done playing to improve their game.

- **The parties involved.** The following actors are involved in the Playtest:
 - Our players: a player who plays a specific game and is randomly selected for a Playtest.
 - Our developers: the developer who requests a Playtest.
- **The purpose of the processing.** When you consent to a Playtest, your information will be processed for the purposes of analyzing and improving the game by the game developer.
- **The data that is processed.** When you consent to the Playtest, the following information about you is shared with the developer of the game:
 - Gameplay activity;
 - Device ID;
 - Browser type;
 - Global geographic location (e.g. location on national or city level);
 - Other technical information (e.g. regarding the interaction between your device and the Poki Website, the web pages that were visited, the links clicked and the log data).

Sensitive information:

In the context of the Playtest we do not process sensitive information.

- **Legal grounds for the processing.** The legal ground for processing of your data for the Playtest on the Poki Website is your consent. When a player is randomly selected for a playtest, the player will be shown a pop-up before the game is started. In this pop-up the player will be able to accept or refuse the Playtest.

3. HOW DO WE OBTAIN YOUR DATA?

Poki will obtain your data in various ways:

- **Provided by you.** The game activity is directly recorded when you are playing.
- **Automatically obtained.** Some data will be obtained automatically, for example by using cookies and similar techniques. When your computer or mobile device contacts our web servers (e.g. when you visit the Poki Website), our web servers automatically collect usage information. Such usage information includes information about how our Website Visitors use and navigate the Poki Website. It can include the number and frequency of Website Visitors to each web page and the length of their stays, browser type, and referrer data that identifies the web page visited prior and subsequent to visiting the Poki Website. Further information on this is included in our [Cookie Statement](#).
- **Derived.** The developer may also derive data from the information obtained during a Playtest. For example: that a certain level is finished too soon or, oppositely, takes too long.

In principle you are under no obligation to provide any information about yourself to us. You are also able to play the game you refuse the Playtest.

4. WHO DO WE SHARE YOUR DATA WITH?

The Playtest data will only be shared with the developer of the relevant game. Poki has data protection agreements in place with these developers, to adequately safeguard your data and abide by the privacy laws. Data transfers are also arranged for in these agreements.

5. HOW LONG IS YOUR DATA RETAINED?

Your Playtest data is not stored or recorded in any way. The developer of the game you are playing will only be able to see the game activity in real time. After the session has ended, the developer cannot generate a playback of the game activity.

6. WHAT ARE YOUR PRIVACY RIGHTS (INCL. RIGHT TO OBJECT)?

Based on the General Data Protection Regulation ("GDPR"; (EU) 2016/679) you have various privacy rights, such as the rights to access, the right to object or the rights to withdraw your consent at any time and without detriment. For more information about these rights, please go to [this webpage](#) or [this webpage](#) of the European Commission.

We will respond to all requests without undue delay. If our full response will ever take more than a month due to complexity or number of requests, we will notify you of this and keep you updated. Furthermore, please note that we may request more information to confirm your identity before acting on any request.

6.1. How to exercise your rights. You can exercise your privacy rights free of charge, by phone or by e-mail via the contact details displayed below. If requests are manifestly unfounded or excessive, in particular because of the repetitive character, we will either charge you a reasonable fee or refuse to comply with the request.

6.2. Verification of your identity. We may request specific information from you to help us confirm your identity before we further respond to your privacy request.

6.3. Follow-up of your requests. We will provide you with information about the follow-up of the request without undue delay and in principle within one month of receipt of the request. Depending on the complexity of the request and on the number of requests, this period can be extended by another two months. We will notify you of such an extension within one month of receipt of the request. The applicable (privacy) legislation may allow or require us to refuse your request. If we cannot comply with your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

7. HOW CAN YOU CONTACT US?

If you have any questions concerning this Privacy Statement or your privacy, please contact us at privacy@poki.com or via:

Poki B.V.
Spui 10
1012 WZ Amsterdam
The Netherlands
+31 20 2800 870 (for communication in Dutch or English)

Please let us know by e-mail in advance if you prefer to have further contact over the phone via another preferred language. We will then provide you with the relevant phone number.
