



Privacy Policy

We – Travian Games GmbH, Wilhelm-Wagenfeld-Straße 22 in 80807 Munich/Germany (hereinafter referred to as "Travian Games" or "we") – operate the website Admirals: Caribbean Empires (admirals-game.com) and are responsible for the collection, processing and use of your personal data in accordance with the EU General Data Protection Regulation (GDPR) and other national data protection laws of the member states and other data protection regulations. Your personal data is collected and used exclusively in accordance with the legal provisions of the applicable data protection law.

First and foremost, we adhere to data protection legislation and protect your privacy to the greatest extent possible. However, we would like to make it absolutely clear: data exchange is the lifeblood of the Internet, and the Internet is still associated with many security vulnerabilities. Even when your data is encrypted when visiting our website, there is always a residual risk – at the latest while interacting with external websites.

In the event that you are being redirected to another website operated by Travian Games on another website that is not operated by Travian Games, or if you make use of the services of third parties (for example, during a payment process), please note that this Privacy Policy does not apply to this third-party website.

What is personal data?

Personal data in this sense refers to all individual pieces of information regarding the personal or material circumstances of an identified or identifiable natural person, such as name, address, or email address as well as IP address.



Controller for the processing of data pursuant to Art. 4 (7) GDPR

Controller for the processing of data is

Travian Games GmbH

Wilhelm-Wagenfeld-Straße 22

80807 Munich

Telephone: +49 (0)89 324915-0

Fax: +49 (0)89 324915-970

Email: privacy@traviangames.com

Contacting the data protection officer

If you have any questions or suggestions regarding data protection, please do not hesitate to contact us or our data protection officer. You can contact our data protection officer via the following email address: privacy@traviangames.com or alternatively also by post at the address mentioned above with the addition "The Data Protection Officer".

Further contact options and information can be found in our [imprint](#).

When you contact us by email, we will store your email address and, if you have transmitted the respective details, your name and telephone number in order to answer your questions. All data arising in this context is deleted after storage is no longer necessary or – in the case of statutory retention obligations – the corresponding processing is restricted.

What are my rights?

You can contact us at any time if you have any questions about your rights with regard to data protection or if you would like to assert one of your following rights:

- Right of withdrawal pursuant to Art. 7 (3) GDPR (for example, you can contact us if you would like to withdraw your previously granted consent to receive a newsletter)
- Right of information pursuant to Art. 15 GDPR (for example, you can contact us if you would like to know what data we have stored about you)
- Rectification pursuant to Art. 16 GDPR (for example, you can contact us if your email address has changed and we should replace your email address)
- Erasure pursuant to Art. 17 GDPR (for example, you can contact us if you would like us to delete certain data that we have stored about you)
- Restriction of processing pursuant to Art. 18 GDPR (for example, you can contact us if you would like us not to delete your email address, but instead only use it to send you absolutely necessary emails)
- Data portability pursuant to Art. 20 GDPR (for example, you can contact us if you would like to receive the data we have stored about you in a compressed format, such as because you would like to provide this data to another website)
- Objection pursuant to Art. 21 GDPR (for example, you can contact us if you do not accept one of the advertising or analytical processes indicated here)
- Right to lodge a complaint with the competent supervisory authority pursuant to Art. 77 (1) GDPR (for example, you can also contact the data protection supervisory authority directly if you wish to complain)



Competent supervisory authority:

Bavarian State Office for Data Protection (Bayerisches Landesamt für Datenschutzaufsicht)

Postal address

P.O. Box 606
91511 Ansbach
Germany

Erasure and storage period

Unless otherwise indicated, we delete your data as soon as we no longer need it. The data will also be erased or blocked if a storage period determined by law expires, unless a further storage of the data for the conclusion or performance of a contract is necessary. Certain data must be retained for longer periods for legal reasons. Of course, you may request information about your stored data at any time.

How is your personal data protected?

We will take all reasonable and appropriate measures to protect the personal information we store about you against misuse, loss or unauthorized access. To this end, we have taken a range of technical and organizational measures. They also encompass measures for our response in the event of any suspected data breaches.

If you suspect that your personal data has been misused or misplaced or accessed by an unauthorized person, please let us know as soon as possible by contacting us using the above-mentioned contact details!

Legal bases for data processing

We only collect and process your personal data if this is permitted by law. In addition to your explicit consent, other legal bases may be considered for this purpose. If the processing is based on your consent, Art. 6 (1) a) EU General Data Protection Regulation (GDPR) serves as legal basis for the processing of your data.

The processing of personal data required to fulfill the license contract is subject to the legal basis pursuant to Art. 6 (1) b) GDPR.

If the processing of personal data is necessary to comply with a legal obligation to which our company is subject, Art. 6 (1) c) GDPR is the legal basis.

And if processing is necessary to **safeguard a legitimate interest of Travian Games** or a third party and if the interests, fundamental rights and freedoms of you as the data subject do not outweigh the former interest, Art. 6 (1) f) GDPR shall apply as the legal basis for processing. In the event that processing is based on such a balance of interests, you have a right to object to this data processing, insofar as you have special reasons for this objection and that we are unable to demonstrate any compelling and legitimate reasons for this processing.

You will find the relevant legal basis for individual data processing at the end of the respective descriptions of data processing.

If we use contracted service providers for individual functions of our offer or would like to use your data for advertising purposes, we will inform you in detail about the respective processes below. Where we cooperate with appropriate service providers, we have carefully selected them with regard to compliance with the legal requirements for data protection and data security and have entered into order processing agreements with them, which comply with the requirements of Art. 28 GDPR. If the service providers are based outside the EU, we



ensure that there are appropriate safeguards as referred to in Art. 46 GDPR that a corresponding level of data protection is given by the processor. For example, certification under the EU US Privacy Shield or EU standard data protection clauses may be considered. We will refer to the appropriate safeguards accordingly.

Visiting the website

We do not collect any personal data during simple visits to our website, with the exception of data transmitted by your browser in order to enable the visit to the website. This includes:

- IP address
- Date and time of the request
- Content of the request (specific page)
- Access status / HTTP status code
- Any data quantities transmitted
- Website from which the request originates
- Browser
- Operating system

We delete or anonymize the IP addresses of website visitors after the end of use.

Anonymization means that the IP addresses are modified such that the individual details regarding personal or material circumstances can no longer be associated with an identified or identifiable natural person, or may only be associated to such a person with an unreasonable expenditure of time, costs and effort.

For you as a visitor to our website, the most interesting item is the IP address, as this refers to data that can in theory be linked to your identity. As a **security measure** for your privacy, we therefore delete or anonymize your IP address after you have visited our website. This means the other technical data can no longer be traced back to you and this data may thus only serve



anonymous, statistical purposes in order to optimize our website. **The purpose** of temporarily storing the data at the beginning is to ensure the connection as well as the accessibility and correct display of our website. The IP address and the aforementioned technical data are required in order to display the website, prevent display problems for visitors and resolve error messages. The **legal basis** is the legitimate interest that has been reviewed in connection with the aforementioned security measures as well as in accordance with the European data protection requirements pursuant to Art. 6 (1) f) GDPR.

Data entered by users – registration

Registration is required in order to use the games. When registering, you must enter an email address and choose a password. Such data will be stored permanently as soon as you click on the activation link sent to the email address provided during the registration process. If you do not access the link, this data will be deleted after two weeks. Please do not use your real name, the name of another person or that of a protected registered trademark as a username. In addition, we assign you to a country based on the transmitted IP address of your device. This information will be saved to enable us to offer you a suitable selection of payment methods.

We will offer a service for more and more games that allows you to register only once for a game, but to move with this game account on several game worlds within this game. The data you provide when registering for a game is stored for this purpose by the respective game at a central location.

We use personal data to make the secure, effective and user-related use of our apps possible, such as for

- the anonymous statistical evaluation for studies to improve and make the apps more user-friendly,



- the recommendation by you to friends and acquaintances (email address) by means of the "Invite" function,
- the use of "social features", for example in order to share messages and/or articles with others on social networks or by email, and mark such posts with the "Like" button.

Social sign-in

In addition to manual registration, we offer you the possibility of registering directly with us using your existing profile with a social network of selected providers. Here, we use the platforms "Facebook sign-in" and "Google+ sign-in". If you wish to use one of these functions, you will be redirected to the page of the respective provider and navigated through the registration.

With the data transmitted by the respective social network provider, we create your user account. We do this, of course, without saving lists of friends and contacts. There is no permanent link between your account and your Facebook and Google account. More details can be found in the privacy policies of the respective services.

Addresses of the respective plug-in providers and URL with their data protection information:

a. [Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA;

<http://www.facebook.com/policy.php>; further information regarding data collection can be

found here : <http://www.facebook.com/help/186325668085084>,

<http://www.facebook.com/about/privacy/your-info-on-other#applications> and

<http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook is subject to the

EU US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.



b. Google Inc., 1600 Amphitheater Parkway, Mountainview, California 94043, USA:
<https://www.google.com/policies/privacy/partners/?hl=en>. Google has committed itself to adhere to the EU US Privacy Shield: <https://www.privacyshield.gov/EU-US-Framework>.

As a **security measure**, the data entered by you is transmitted to the respective platform by way of an encrypted connection. We do not use the registration to access personal data such as friends lists or contacts or to store them for our own purposes. No permanent link is established between your user account and your Facebook and Google account. Both networks are certified according to the EU US Privacy Shield (more information is available in the respective privacy policies). We do not know which data is collected or linked with other data by the social networks during the registration process. **The purpose** of the requested data is to register using an existing user account in order to use the extended functions on the website. Registration via the social networks takes place on a voluntary basis and can be withdrawn at any time, or respectively the user account can be de-registered. **The legal basis** is your consent in accordance with the European data protection requirements pursuant to Art. 6 (1) a) GDPR.

Contact options for Support/the Help Center

We use the cloud-based ticket system Freshdesk (Freshworks Inc., 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA) for customer inquiries. You can find more information about data protection and how Freshdesk complies with the GDPR here: <https://www.freshworks.com/gdpr/>

When using it, the information you supply is transmitted to Freshworks and stored on their Servers in the U.S. Freshworks is certified under the EU-U.S. Privacy Shield framework (<https://www.privacyshield.gov/participant?id=a2zt0000000GnbQAAS&status=Active>), which means that the legal requirements are in place to ensure an adequate level of protection



pursuant to Article 45 GDPR. The Privacy Shield is an agreement made between the European Union and the United States of America which is intended to ensure compliance with European data protection standards in the U.S. You can find more information about Freshworks and data protection on the Freshworks website (<http://freshworks.com/privacy>).

Moreover, we have concluded a data processing agreement pursuant to Article 28 GDPR with Freshworks.

The legal basis for the aforementioned data processing is found in Article 6, paragraph 1, clause 1, point b) and point f) GDPR. It is processed for the purpose of considering and responding to such inquiries, and in particular to take steps at the request of the data subject prior to entering into a contract. This, as well as our interest in direct and effective communication with customers, gives rise to our legitimate interest to the described data processing.

Your data is automatically deleted as soon as the respective inquiry is closed and no further, possibly legislative, reason permits further storage.

Data collection in connection with newsletter registration

We use the "double opt-in" procedure for providing our newsletters. This means we will only send you a newsletter by email if you confirm that you wish to receive our newsletter by clicking on a link contained in our notification email. If you confirm your wish to subscribe to the newsletter, we will store your email address until you cancel your newsletter subscription. The data is stored only in order to be able to send you the newsletter.

Naturally, you may cancel your subscription to our newsletter at any time; a relevant link can be found in each newsletter. Alternatively, you may use the above-mentioned contact details of ours.



In order to dispatch our newsletter, we work with the service provider salesforce.com EMEA Limited, Floor 26 Salesforce Tower, 110 Bishopsgate, London, EC2N 4AY, United Kingdom. We have concluded an order processing agreement with this service provider in compliance with the requirements of Art. 28 GDPR.

Communication in the games

The games operated by us offer you various ways to communicate with us or other players. We use automatic filter systems that prevent communication in violation of § 9 of the General Terms and Conditions of Travian Games GmbH. In particular, we use automatic filter systems that prevent the mass sending of messages or insulting, violence-inciting, obscene, racist or otherwise offensive statements or messages with an advertising character. Moreover, we log the use of the provided communication channels for a short time to analyze and correct technical errors, to guarantee system security and integrity, to combat abusive and/or unauthorized use and to compile usage statistics on a non-personal basis. The reports that are generated contain the date and time of the message, the sender and recipient, the message text and the volume of data sent.

None of our employees will read messages without your consent. However, in case of suspected misuse and/or unauthorized use of the communication channels provided (for example, when the recipient reports a message), we reserve the right to investigate the affected game account and the messages sent from this game account and to take further measures if necessary.

As a **security measure**, the data entered by you is transmitted to the respective platform by way of an encrypted connection. **The purpose** of processing is to provide an in-game communication solution for the exchange of messages between players. **The legal basis** for the temporary storage of data is Art. 6 (1) a) GDPR and Art. 6 (1) f) GDPR. The data input for communication purposes is voluntary and therefore based on the consent of the user. The use of filter systems serves to check compliance with the rules of proper communication and



to protect the rights of third parties. These purposes also constitute our legitimate interest in data processing pursuant to Art. 6 (1) f) GDPR.

Payment processing

If you initiate a payment process, you must enter additional data. What data you have to enter depends on the type of payment method you have chosen. We allow you to use anonymous payment methods.

We transmit the data required for payment processing to service providers who are commissioned to collect the fee. For this purpose, we have carefully selected the service providers Adyen GmbH, PayPal and PPRO and concluded order processing contracts with them in accordance with the requirements of the EU General Data Protection Regulation. This ensures secure data processing in compliance with data protection regulations.

Cooperation with third parties also involves payment processing via external service providers (PayPal, credit card companies, mobile network operators, etc.). These third parties are legally bound to manage your personal data in a confidential and secure manner in accordance with statutory legislation and may only use your personal data to fulfill their contractual obligations. You can choose the respective service provider and may decide voluntarily for or against a payment method.

When you initiate a payment within the game, a cookie will be placed that contains a randomly generated ID number. This cookie is required in order to return you to the game once the payment process has been completed.

We employ members of staff who ensure the proper processing of the payment processes that have been initiated and who have access to the necessary data for this purpose. These employees act solely in accordance with our instructions and are specifically obliged to comply with data protection regulations. Such employees use anonymous payment data to

detect and prevent any misuse of the payment processes. In the event of a violation, the payment process will be canceled.

We are entitled to make data available to third parties to whom we have assigned claims against the user or who are commissioned to collect the fee, insofar as this is necessary for the fulfillment of the claim or the collection of the fee.

Cookies

Our website sometimes uses cookies. Cookies are small text files that are usually saved in a folder of your browser.

In the event of cookies that do not contain an exact date of expiry, they are only stored temporarily and automatically deleted as soon as you close your browser or restart the end device. Cookies with a date of expiry also remain stored when you close your browser or restart the end device. These cookies are only removed at the date indicated or if you delete them manually.

On our website, we use the following three types of cookies:

- Required cookies (we need these, for example, in order to display the website correctly for you and temporarily save certain settings)
- Function and performance-related cookies (these help us, for example, to evaluate technical data regarding your visit and thereby prevent error messages)
- Advertising and analytical cookies (these enable, for example, advertising for shoes to be displayed if you previously searched for shoes)

You can configure, block and delete cookies in the settings of your browser. If you delete all cookies for our website, it is possible that some functions of the website will not be displayed



correctly. Helpful information and guides for common browsers are provided by the German Federal Office for Information Security:

https://www.bsi-fuer-buerger.de/BSIFB/DE/Empfehlungen/EinrichtungSoftware/EinrichtungBrowser/Sicherheitsmassnahmen/Cookies/cookies_node.html

Google Fonts

In order to improve the appearance of text, Google Fonts (<https://fonts.google.com>) by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google") is used; Google Fonts concerns a repository of fonts by Google. These fonts are transmitted and activated when accessing this website or other websites in the memory folder of your browser. If this is not supported, the text on the website will only be displayed in a standard font. In order to enable this, a request is sent to domains such as fonts.googleapis.com or fonts.gstatic.com, which receive your IP address for technical reasons. Your data is not, however, linked with other data or associated with your personal identity.

As a **security measure**, we have assured ourselves that this use of the font repository of Google does not involve any linking of data with other Google offers, for example if you have a Google user account. This is confirmed by the information on data protection provided by Google Fonts (<https://developers.google.com/fonts/faq>). In addition, the high security standards of the Google platform and the associated Google Privacy Policy apply (<https://policies.google.com/privacy>). As Google is based in the USA and thus in a third country, further guarantees are required to ensure an adequate level of European data protection. Google has certified itself in accordance with the EU US Privacy Shield and

therefore demonstrated a corresponding level of data protection (<https://www.google.com/policies/privacy/frameworks/>).

The purpose of the data transmission is to correctly display fonts in the manner we have chosen. The IP address is required in order to establish a connection with the Google servers and to download the font repository, unless this is already available on the terminal device. **The legal basis** is the legitimate interest that has been reviewed for the pursuit of the purpose and in connection with the aforementioned security measures as well as in accordance with the European data protection requirements pursuant to Art. 6 (1) f) GDPR.

Font Awesome

For the purpose of consistency, this website uses web fonts provided by Fonticons, Inc. When you access a page, your browser loads the necessary web fonts into your browser cache in order to correctly display text and font types.

To accomplish this, your browser needs to establish a connection to the servers operated by Fonticons, Inc. In the process, Fonticons, Inc. obtains the information that our website was accessed from your IP address. Web fonts are used in the interest of presenting our website in a way that is consistent and appealing. This represents a legitimate interest in the meaning of Article 6, paragraph 1, point f) GDPR.

If your browser does not support web fonts, it will use a default font from your computer.

You can find more information about Font Awesome at <https://fontawesome.com/help> and in the privacy statement of Fonticons, Inc.: <https://fontawesome.com/privacy>.

Contentful

We use a content manager from a service provider to, among other things, load image files onto our website. For this purpose, we use the services of 'Contentful' from service provider Contentful GmbH, Ritterstraße 12-14, 10969 Berlin, Germany.



Privacy statement: <https://www.contentful.com/legal/de/privacy/>

The purpose of the data transmission is to correctly display the images the way we intended. The IP address is required to establish a connection to the servers and to load the images. The legal basis is the legitimate interest in pursuing the purpose and in the framework of the aforementioned security measures.

Unity Analytics

We use Unity Analytics, a web analysis service from Unity Technologies ApS (company no. 30 71 99 13), Vendersgade 28, DK-1363 Copenhagen, Denmark ('Unity'). Unity collects and stores data using pseudonyms. This data is used to analyze usage of the app (for example, which difficulty levels were managed, etc.) and is then evaluated for the sole purpose of improving the content and customizing it based on requirements. This data pertains only to usage within the app and cannot be attributed to individual end devices. Moreover, the information collected is of a more general nature (such as device type, software version, etc). This data is likewise analyzed on an anonymous basis.

You can find more information about the terms of service and data protection at

<https://unity3d.com/de/legal/terms-of-service/analytics>

and

<https://unity3d.com/de/legal/privacy-policy>.

As a **safeguard**, we have concluded a separate data protection agreement with Unity which prescribes technical and organizational measures to protect your data. The purpose for using Unity Analytics is the anonymous analysis of your usage behavior. The insights gained in this way help us to improve our offer. The legal basis is the legitimate interest that has been reviewed for the pursuit of the purpose and in connection with the aforementioned security measures as well as in accordance with the European data protection requirements pursuant



to Art. 6 (1) f) GDPR. Moreover, an order processing agreement has been entered into in accordance with the requirements of Art. 28 GDPR.

Handling of children's data

We are aware of the importance of data security and protection of children on the Internet. For this reason and in order to comply with certain laws, we neither deliberately collect the personal, individually identifiable information of children under 16 years of age, nor do we offer content to children under 16 years of age.

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