

Privacy Policy

Introduction

This document is the Privacy Policy of Travian Games GmbH, Wilhelm-Wagenfeld-Straße 22, 80807 Munich, Germany (hereinafter referred to as "TRAVIAN GAMES"). It applies to all websites, mobile apps and games operated by TRAVIAN GAMES.

In the event that a link contained on a website operated by TRAVIAN GAMES redirects you to another website that is not operated by TRAVIAN GAMES, or if you access the services of a third party (such as when making a payment), please be aware that this Privacy Policy will not apply to the third-party website.

TRAVIAN GAMES collects, processes and stores any data that you willingly submit to TRAVIAN GAMES (such as in standard forms or otherwise on the websites and games operated by TRAVIAN GAMES) by electronic or other means of communication, or which have been transferred during the interaction between you and the websites and games of TRAVIAN GAMES, in accordance with the following sections and in compliance with statutory regulations.

This includes data you provide to other users when communicating with them on websites and games operated by TRAVIAN GAMES.

1. Visiting the websites of TRAVIAN GAMES

When you visit a website operated by TRAVIAN GAMES, your browser automatically forwards the IP address, browser version, screen resolution and operating system of the device you used to access the site. Your browser will also provide the date, time and duration of the visit to the website and the various sites you accessed during your visit. TRAVIAN GAMES uses this information to optimize its websites and games. In addition, TRAVIAN GAMES uses the analysis tool Google Analytics on its websites. Please read the information disclosed under 4. d) for more details on the use of Google Analytics.

2. Using the games of TRAVIAN GAMES

a Registration

When you register for a game operated by TRAVIAN GAMES you will be required to enter your email address and to select a username and password. This data will be permanently stored by TRAVIAN GAMES once you access the activation link sent to the email address you supplied when you registered. 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, TRAVIAN GAMES will assign a country to you based on the IP address of the device which has been entered. This information will be saved to enable us to offer you a suitable selection of payment methods.

If you click on an advertising link on any TRAVIAN GAMES website and are then forwarded to a website operated by TRAVIAN GAMES, a cookie will be set on your computer that contains information on which advertising link you clicked, for which advertiser, for which game, at what time and in which country. TRAVIAN GAMES will also assign a country to you based on the IP address of your device. TRAVIAN GAMES will assess this non-personal data to optimize its advertising campaigns and for accounting purposes regarding its advertisers. The cookie will be deleted once the activation link has been accessed.

TRAVIAN GAMES is offering a service for an increasing number of games that allows you to carry out a one-time activation for a game and then use this game account to move easily between multiple game worlds within this game. The data you provide when registering for a game are stored for this purpose by the respective game at a central location.

b Use of the games

TRAVIAN GAMES stores and processes your personal data to implement the game user contract that has been agreed and the use options associated with this contract (such as the use of the games, utilization of support, etc.). TRAVIAN GAMES also uses the analysis tools Google Analytics and SWRVE for its games. Please read the information disclosed under 4. d) and e) for more details on the use of Google Analytics and SWRVE. The same applies if you access a TRAVIAN GAMES game using one of the mobile apps operated by TRAVIAN GAMES.

c Communication channels

The games and websites operated by TRAVIAN GAMES offer you various opportunities to communicate with TRAVIAN GAMES or other players. TRAVIAN GAMES uses automatic filtering systems that prohibit any communications that violate § 9 of the Travian Games GmbH General Terms and Conditions. In particular, TRAVIAN GAMES uses automatic filtering systems to block any mass mailings and messages that are of an offensive, obscene or racist nature, that glorify violence or any other objectionable statements or messages that advertise products or services. Moreover, TRAVIAN GAMES records the use of the communication channels for a short period to analyze and fix any technical errors, to guarantee system security and integrity, to combat abusive and/or unauthorized use and to generate user 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.

No employees or agents of TRAVIAN GAMES will read your messages without your consent. Should TRAVIAN GAMES suspect any abusive and/or unauthorized use of the available communication channels (such as when a recipient reports a message), TRAVIAN GAMES reserves the right to investigate the relevant game account and the messages sent from that account and to take further action where appropriate.

d Investigating manipulations of game operations

TRAVIAN GAMES will collect and store records which reflect how the websites and games operated by TRAVIAN GAMES are used, such as in-game user activities and in-game communication between users or communication within game-related services. This includes the monitoring of playing patterns and checks for possible manipulations of game operations which can then serve to detect any abusive or improper activities of users. TRAVIAN GAMES uses special programs to detect violations of the rules of the games, such as programs that can detect the use of unauthorized scripts. In order to do that it can store IP addresses, login data of the last fourteen days and any other data the browser transfers as header information. Furthermore, TRAVIAN GAMES employs individuals who are specifically trained to do this and who may be employees or freelancers working for TRAVIAN GAMES. TRAVIAN GAMES will also select suitable individuals from its ranks of players who have expressed an interest in performing such tasks voluntarily. The employees, freelancers and volunteers ("specially trained personnel") will have access to the same data as the special programs used by TRAVIAN

GAMES to carry out their duties. The specially trained employees will also be assigned to identify, detect and penalize any infringements against the current General Terms and Conditions and game rules, such as the illegal use of several game accounts or insults to other players. The specially trained employees act exclusively in accordance with the stipulations and instructions of TRAVIAN GAMES and are tasked in particular with ensuring compliance with statutory data protection regulations. In terms of processing personal data, TRAVIAN GAMES remains the liable party. If TRAVIAN GAMES ascertains that you are acting in breach of your contractual obligations, such as by using unauthorized scripts, TRAVIAN GAMES expressly reserves the right to merge your IP address with other data which TRAVIAN GAMES has stored about you to advise you of such infringement. TRAVIAN GAMES may then take further action against the respective user to restore normal game operations.

e Internal research

TRAVIAN GAMES also uses the information stored by you or about you for internal research regarding demography, user interest and user behavior. The use of this data is pseudonymized. You can object to the collection and storage of this data at any time, effective for the future. Please send your revocation to the email address indicated below. No other costs shall be incurred for a revocation apart from the costs of transmitting such revocation.

f Payment processing

You will have to supply additional information when making a payment and the type of data depends on the kind of payment method you have selected. TRAVIAN GAMES offers a range of anonymous payment methods.

TRAVIAN GAMES will forward the data required to process the payment to the service providers responsible for collecting the payment. TRAVIAN GAMES will assign TG Payment GmbH in Munich (Germany) to provide such payment services. Collaboration 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.

When you initiate a payment during the game, a cookie will be set that contains a randomly generated ID number. This cookie will be required to return you to the game once the payment process has been completed.

TRAVIAN GAMES employs persons responsible for ensuring payment processing is carried out properly; these persons can therefore access any information that is required for this purpose. Such employees act exclusively in accordance with the stipulations and instructions of TRAVIAN GAMES and are tasked in particular with ensuring compliance with statutory 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. In addition, TRAVIAN GAMES reserves the right to use the available data to implement further measures and to potentially combine it with other personal data.

TRAVIAN GAMES is entitled to provide data to third parties to whom receivables for TRAVIAN GAMES from the user have been assigned or to third parties who are responsible for collecting payment to the extent required to fulfill the collection of the receivables or the collection of the charges.

g Use-based online advertising

When using the Travian website, advertisements are displayed which have been optimized according to their relevance for you. The advertisers displayed collect individually anonymized data about your usage behavior. For instance, data is collected regarding the webpages visited, the offers used, and the banners clicked. No users can be personally identified on the basis of this data, in accordance with statutory regulations, due to the pseudonymization of the data collected. For technical reasons, IP addresses collected are not used for activating advertising on the basis of user behavior and are fully anonymized.

You can find further details on how Google uses advertising technologies to process data via the following link:

<http://www.google.com/intl/de/policies/privacy/partners>

If you would not like to receive any targeted advertising from Google, you can deactivate this via the following link:

<http://www.google.com/ads/preferences>

The Travian website you visit uses the following services or service providers:

- Google AdSense, a service that integrates advertising from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Google Ad Exchange, a service that integrates advertising from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA
- Flyber GmbH, Johannisstraße 20, 10117 Berlin, Germany
- ATG Ad Tech Group GmbH, Stresemannstr. 342, 22761 Hamburg, Germany

In addition, we permit other third parties, such as media agencies, to set cookies in order to analyze the use of online advertising and present you with targeted advertising, based on your preferences, on our websites. Moreover, this enables media agencies to address the target group of their advertisers as precisely as possible and without advertising wastage. Anonymous statistics are thereby generated and the data are used for market research purposes. The data cannot lead to the identification of an individual.

Our Travian websites also use "conversion tracking pixels" from Facebook Inc., 1601 S. California Ave., Palo Alto, CA 94304, USA, www.facebook.com ("Facebook") and/or Twitter International Company, The Academy 42, Pearse Street, Dublin 2, Ireland, <http://www.twitter.com> ("Twitter") and/or Google AdWords, Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, www.google.com/adwords ("Google"). This tool enables us to trace the actions of users once they have been forwarded by clicking on a partner's advert on a website of the provider. This means we are able to record the effectiveness of Facebook or Twitter ads or Google ads for statistical purposes or for market research. The data collected in this way are anonymous. We cannot, therefore, see any personal data belonging to an individual user. The collected data are, however, stored and processed by Facebook or Twitter or Google. We shall inform you about this in accordance with the information available to us at the time. Facebook, Twitter and Google can combine this data with your Facebook, Twitter or Google account and use the data in accordance with their own data protection policies at

<https://www.facebook.com/about/privacy/>

or

<https://twitter.com/privacy>

for their own advertising purposes.

Conversion tracking enables Facebook, Twitter, Google and their respective partners to display advertising to you within and outside Facebook, Twitter or the Google Display Network. In both cases, a cookie is also stored on your computer for this purpose.

Please click here if you wish to revoke your consent for this:

https://www.facebook.com/ads/website_custom_audiences/

or

<https://twitter.com/settings/security>.

h Use via a third-party platform; mobile tracking

We use mobile tracking technologies to continually improve and optimize our offering. We use the services of adjust GmbH, Saarbrücker Str. 38a, 10405 Berlin, Germany (www.adjust.com) for this purpose. By using these services, we collect statistical data about how our websites are used in order to constantly improve our offering. As regards the use of our apps, we receive information from your mobile devices which we then record and evaluate. The following data are thereby collected: IP addresses which are immediately anonymized, MAC addresses, anonymized device ID (Identifier For Advertisers - IDFA or Google Advertiser ID - GAID), type of web browser, language, Internet service provider, network status, time zone, URL of the access and exit page, time spent and the date of access, clickstream data and other statistical information about the use of our services. An individual cannot be identified on the basis of this data. The data collected in this manner are used to create anonymous use-profiles. The data collected using tracking technology are not used to personally identify the visitor of these websites without the consent of the affected person. The collection and storage of data can be prohibited, effective for the future, by adjusting the settings in your mobile device as described in section 8.

3. Transfer of your data to third parties

In certain cases TRAVIAN GAMES will forward your personal data to the following third parties:

- Payment providers (c.f. previous section)

- IT service providers (e.g. email providers, host providers)
- Database services (e.g. analysis of advertising campaigns)
- Associated companies (e.g. payment data to TG Payment GmbH)
- State agencies (e.g. investigative authorities)

Such third parties are legally bound to manage your personal data in a confidential and secure manner in accordance with statutory legislation and can only access your personal data if such data is required to fulfill their duties or there is a legal basis for the same.

Moreover, TRAVIAN GAMES will only allow third parties to contact you for advertising purposes with your express, prior consent, in which case TRAVIAN GAMES will forward your email address to such third parties.

4. Technical features

a Cookies

Cookies are small files that enable TRAVIAN GAMES to record certain information about your device, for example to identify you when you re-visit a website or to generate statistics. Most cookies are automatically deleted when you close the browser or exit any websites or games operated by TRAVIAN GAMES. However, some cookies may be stored for a longer period. The above sections describe in more detail how TRAVIAN GAMES uses cookies.

b Web beacons

TRAVIAN GAMES uses "web beacons" (a.k.a. clear GIFs or web bugs, etc.). A web beacon is a link placed on a website which points to a small graphic image. When the website is then called up with the embedded link, the small graphic image will automatically be requested. TRAVIAN GAMES uses web beacons to optimize websites and advertising campaigns by counting or recording the number of visits to a particular website, if and when an email was opened, etc. The above sections describe in more detail how TRAVIAN GAMES uses web beacons.

c Social plug-ins

TRAVIAN GAMES uses social plug-ins on its websites and games such as Facebook's "Like" button or Facebook Connect and Google's "Google +1" button. A shared feature of social plug-ins is that when you access a

TRAVIAN GAMES website that uses a social plug-in, the same data will be forwarded to the social plug-in provider that would be forwarded if you accessed the provider's website directly. For example, if you call up a provider website that has Facebook "Like" button embedded, Facebook will receive your IP address, the browser version and screen resolution and the operating system of the device you have used to access the site and the URL of the website containing the "Like" button. This applies even if you have used none of the services offered by such providers. If the plug-in has been provided by Facebook or Google, the above-mentioned data will be transferred to the USA.

Additional information will be forwarded if you are logged in to one of these services and/or are using the social plug-in while you are accessing the website. Please consult your relevant provider regarding what data will be forwarded in this event.

d Google Analytics

TRAVIAN GAMES uses the third-party web analysis tool Google Analytics for its websites and games. Google Analytics uses cookies to enable us to analyze your visit to the games and websites operated by TRAVIAN GAMES. To do this, Google Analytics collects data using page views, i.e. the technical features of the device used to visit the pages and your activities on the websites and in the games operated by TRAVIAN GAMES. Google Analytics then analyzes this data in the scope of its contractual duties for TRAVIAN GAMES to compile reports to include information regarding from which URL the TRAVIAN GAMES website or game was accessed, from which approximate geographical location a TRAVIAN GAMES website or game was visited, how long the user stayed on the TRAVIAN GAMES website or game and an outline of the user's activities during the visit. TRAVIAN GAMES has configured the Google Analytics tool such that the last octet of your IP address will be deleted before it is saved within Europe. You can disable the use of cookies in your browser settings, but bear in mind that this may also restrict the use of any TRAVIAN GAMES games or websites. Alternately, you can download and install the relevant plug-in for your browser via this link (<https://tools.google.com/dlpage/gaoptout?hl=de>) and the Google Analytics JavaScript code will be instructed to send no information about your visits to TRAVIAN GAMES games and websites to Google Analytics.

e SWRVE

TRAVIAN GAMES uses the web analysis tool SWRVE for its games. For this, code fragments are used in the source code of the game or the mobile apps that are then activated when you carry out a particular action specified by TRAVIAN GAMES (e.g. registration, activation, login, account deletion, purchase of credits, etc.). Once activated, the following data will be sent to the SWRVE servers located in the EU: name of the game or website, country version of the game, a randomly generated and anonymized ID number for your account, an ID number defined for the specified action, description of the specified action, time stamp, browser session ID and IP address. If you access one of the TRAVIAN GAMES games via a mobile app, the following data will also be transferred: network status (e.g. 3G, Wi-Fi), operating system (without the version number) and whether the device is a smartphone or tablet. SWRVE then analyzes this data in the scope of its contractual duties for TRAVIAN GAMES to compile reports to ascertain how a game or mobile app is used. In addition, SWRVE uses the transferred data in an anonymized and aggregated form to inform TRAVIAN GAMES and additional clients of SWRVE of general statements regarding user behavior. Besides this use in an anonymized and aggregated form, SWRVE saves and uses the data transferred from TRAVIAN GAMES only in the scope of its contractual duties and as instructed by TRAVIAN GAMES. You can object to this data collection and storage at any time, effective for the future. Please send your revocation to the email address indicated below. No other costs shall be incurred for a revocation apart from the costs of transmitting such revocation.

f Push notifications

If you have activated the corresponding setting on your mobile device, TRAVIAN GAMES may send push notifications to your mobile device in order to share updates for games and other relevant news. You can manage your push notifications on the "Options" or "Settings" page in the mobile app or in your device's settings.

5. Revocation of consent

You may revoke your consent at any time, provided TRAVIAN GAMES is not processing your personal data for contractual or legal purposes. If the revocation concerns the receipt of game information or any other emails, all game information or other emails sent to you include the option to unsubscribe from any further game information or emails. No other costs

shall be incurred for a revocation apart from the costs of transmitting such revocation.

6. Amending to or deleting personal data

You may amend your personal data at any time (such as to update or correct the data) or delete your personal data in its entirety. Please note that TRAVIAN GAMES will not be able to comply with your deletion request if such a request conflicts with any obligations to preserve records or with any legitimate interests of TRAVIAN GAMES or third parties. If you would like TRAVIAN GAMES to amend your personal data or to cease using your data, please contact TRAVIAN GAMES at privacy@traviangames.com. TRAVIAN GAMES will then make the requested changes or delete your data as quickly as possible. However, TRAVIAN GAMES must remind you that, for technical or organizational reasons, some measures may still be carried out after you have submitted your request for deletion, in the event such measures had already been initiated but not completed by that time.

7. Information on personal data

On request, TRAVIAN GAMES will inform you of all the personal data that is stored about you free of charge. This information will be sent to you in electronic form, generally via email.

8. Deactivating your tracking ID

For Apple mobile devices: Open the settings on your mobile device (i.e. iPhone or iPad) and select the "Data privacy" menu item. You can deactivate ad tracking under "Advertising".

For Android devices: Open the settings in your app list and tap on the ad button. You can deactivate the Google Advertising ID once the ad window has opened.

9. Final provisions

TRAVIAN GAMES reserves the right to amend this Privacy Policy at any time; however TRAVIAN GAMES shall always observe the applicable data protection legislation.

Should you have any general questions regarding this Privacy Policy and data protection at TRAVIAN GAMES, please contact us at the addresses below. If possible, please contact us using the email address you submitted when you registered with the game.

Email:

privacy@traviangames.com

Postal address:

Travian Games GmbH
Wilhelm-Wagenfeld-Straße 22
80807 Munich
Germany

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