



Privacy Policy

We, Travian Games GmbH, collect certain data from you when operating our games and game websites, to the extent necessary. The following Privacy Policy informs you about what we do with your data (personal data) and why we do this. Moreover, we explain how we protect your data, when data is deleted, and what rights you have thanks to data protection legislation.

Who can I turn to?

Responsible for the games, websites, and apps:

Travian Games GmbH
Moosacher Str. 70
80809 Munich

privacy@traviangames.com

Telephone: +49 (0)89 324915-0

Fax: +49 (0)89 324915-970

You can also use these contact details to get in touch with our **data protection officer or another contact relevant to data protection**. Please contact us at any time if you have any specific questions about your data, its deletion, or your rights.

When you contact us by e-mail, we will store your e-mail address and, if you have transmitted the respective details, your name and telephone number to answer your questions. We will delete all data arising in this context after storage is no longer necessary or – in the case of statutory retention obligations – restrict the processing.

What are my rights?

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

- **Right of withdrawal** according to Art. 7 (3) GDPR (e.g., you can contact us if you would like to withdraw your previously granted consent to receive a newsletter)
- **Right of access** according to Art. 15 GDPR (e.g., you can contact us if you would like to know what data we have stored about you)
- **Rectification** according to Art. 16 GDPR (e.g., you can contact us if your email address has changed and we should replace your email address)
- **Erasure** according to Art. 17 GDPR (e.g., you can contact us if you would like us to delete certain data that we have stored about you)
- **Right to the restriction of processing** according to Art. 18 GDPR (e.g., 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)
- **Right to data portability** according to Art. 20 GDPR (e.g., 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** according to Art. 21 GDPR (e.g., 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 according to Art. 77 (1) GDPR (e.g., you can also contact the data protection supervisory authority in your federal state directly if you wish to complain: https://www.bfdi.bund.de/DE/Infothek/Anschriften/Links/anschriften_links-node.html)

Competent supervisory authority:

Bavarian State Office for Data Protection (Bayerisches Landesamt für Datenschutzaufsicht)
Postfach 606
91511 Ansbach
Germany

Erasure of data and storage period

Unless otherwise indicated, we delete your data as soon as we no longer need it, i.e., for example your email address after deregistering from our newsletter. Your data will also be blocked or deleted if a retention period expires. Certain data must be retained for longer periods for legal reasons. Of course, you may request information about your stored data at

any time. Data protection inquiries and other legal concerns can also be stored for a longer period of time within the framework of the legally relevant retention and limitation periods.

Legal bases for the 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 processing is based on your consent, Art. 6 (1a) of the EU General Data Protection Regulation (GDPR) serves as the legal basis for the processing of your data.

Art. 6 (1b) GDPR applies as the legal basis for the processing of personal data required to fulfill the user contract.

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

If processing is necessary to safeguard a legitimate interest of Travian Games GmbH 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 (1f) GDPR shall serve as the legal basis for processing. In the event that processing is based on such a balance of interests, you have the right to object to this data processing (please refer to the explanation of the right to object), insofar as you have special reasons for this objection and 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. There we will also specify the defined criteria for the storage period. Insofar as we cooperate with appropriate service providers, we have carefully selected them with regard to compliance with the legal requirements on data protection and data security and have concluded data processing agreements with them, which comply with the requirements of Art. 28 GDPR. Insofar as 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 met by the processor.

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, primarily including the following:

- IP address (e.g. 81.91.215.example or 2a02:8109:9440:1198:bdb1:551f:example)
- Approximate location based on the IP range (e.g., Berlin)
- Internet provider (e.g., Vodafone or Deutsche Telekom)
- Internet speed (for example, 120 Mbit)
- Date and time (e.g., 11:55 a.m. on 05.25.2023)
- Most recently visited website (for example, www.google.com)
- Browser (for example, Chrome or Safari)
- Operating system (for example, Mac OS)
- Hardware (e.g., Intel processor)

As a **security measure** for your privacy, we 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 is to meet the technical necessity of establishing a connection and to ensure the correct and faultless 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 according to Art. 6 (1f) GDPR.

Downloading our apps

When downloading one of the apps we offer, the required information is transferred to the respective app store, in particular the username, email address, and customer number of your account, time of download, payment information, and the individual device code number. We have no influence on this data collection and are not responsible for it. We only process the data if it is necessary for downloading the mobile app to your mobile device.

Registration/Login

You also have the option of registering on our website and then logging in with a user account at any time. To register with us, the following data is required:

- Email address
- Password

We will store such data permanently as soon as you click on the activation link sent to the email address entered 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. Moreover, we will 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.

In some cases, we will offer a service that allows you to register only once for the game, but to use this game account on several game worlds within the game. The data you provide when registering for a game is stored for this purpose by the respective game at a central location.

As a **security measure**, the data you enter is transmitted via an encrypted connection – just like when visiting the rest of the website. After successful confirmation, your data will be stored until you decide to delete individual pieces of data or the entire user account. **The purpose** of the requested data is to create a user account in order to use the extended functions on the website. Registration is voluntary and may be withdrawn at any time and the user data deleted at any time. **The legal basis** is your consent in accordance with the European data protection requirements pursuant to Art. 6 (1a) GDPR. In cases where registration is relevant for the conclusion of the contract, the legal basis is the mutual fulfillment of the contract in accordance with the European data protection requirements pursuant to Art. 6 (1b) GDPR.

Social sign-in and social login

In addition to manual registration, we offer you the possibility of logging in directly with us using your existing user account with a social network of selected providers. 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.

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 user account at Facebook or Google. We do not know which data is collected or linked with other data by the social networks during the registration process. Further details can be found in the privacy policies of Facebook (<https://facebook.com/policy.php>) and Google (<https://policies.google.com/privacy>). **The purpose** of the requested data is to log in using an existing user account in order to use the extended functions on the website. The login via social networks takes place on a voluntary basis and may be withdrawn at any time and the user account logged out. **The legal basis** is your consent in accordance with the European data protection requirements pursuant to Art. 6 (1a) GDPR.

Support Help Center / Contact options

You can use the contact form in the Help Center to get in touch with us and submit questions and suggestions. To use this function, you need to provide additional personal data such as an

email address and avatar name. You can also include attachments such as screenshots to clarify your request.

Newsletter

If you are interested in news about our company or our products, you can sign up for our newsletter. You will then receive an email in which you must click a link to confirm your registration. We will then store your email address until you unsubscribe from the newsletter. An unsubscribe link is contained in every email from our newsletter for this purpose. The newsletter is delivered by the specialized service provider Evalanche (SC Networks GmbH). We have concluded a data processing agreement with the service provider in compliance with the requirements of Art. 28 GDPR. Further information can be found in the privacy policy of the service provider: <https://www.sc-networks.de/datenschutz/>

As a **security measure**, we use the "double opt-in" procedure to ensure that the email address entered actually belongs to you. We have also concluded a data protection contract (data processing) with the commissioned service provider. In addition, you have the option of unsubscribing from the newsletter at any time and thereby deleting your email address from the service provider's database. **The purpose** of data collection is to deliver the newsletter to your personal email address in order to fulfill your request for news about our company or our products. **The legal basis** is your consent in accordance with the European data protection requirements pursuant to Art. 6 (1a) GDPR.

Communication in the games

The games we operate offer you various ways to communicate with us or other players. In some cases, we use automatic filter systems that prevent communication in violation of Section 6 of our General Terms and Conditions. In particular, we use automatic filter systems that prevent the mass sending of messages or insulting, violence-glorifying, 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, guarantee system security and integrity, combat abusive and/or unauthorized use, and 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. **The legal basis** for the temporary storage of data is Art. 6 (1a) GDPR and Art. 6 (1f) 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 according to Art. 6 (1f) GDPR.

Use of the forums

Use of the forums is voluntary and at your own risk. You decide whether you appear in our forums under your real name or under a username of your own choosing (recommended!). It is also your own responsibility to present facts in such a way that your identity and that of other people are not recognizable, i.e. such that these do not contain personal data whose disclosure is not permitted. We process personal data when publishing posts in our forums. The information you provide, such as username, profile picture and posts, is used exclusively for the operation and administration of the forums.

The processing of your personal data is based on your consent in accordance with the terms of use of our games. It should be noted that the published posts are publicly visible and can be viewed by other forum participants. We assume no responsibility for the use of this information by third parties. You have the right to withdraw your consent to the processing of your personal data at any time. In this case, your data will be removed from the forums unless there are legal retention requirements.

Cookies

Our website sometimes uses cookies. Cookies are small text files that are usually saved in a folder of your browser. Cookies contain information about the current or most recent visit to the website:

- Name of the website
- Expiration date of the cookie
- Arbitrary value

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 terminal 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 on the date indicated or if you delete them manually.

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

- Essential 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

Data recipients

In accordance with the descriptions and purposes stated above, we share your data with the following recipients who are essential to providing our services and communicating with you:

- **Google Analytics**, operated by Google Ireland Ltd. with headquarters at Gordon House, Barrow Street, Dublin 4, Ireland. Google Analytics is used to analyze usage behavior and to provide personalized advertising. The data is processed within the European Union. Further information can be found in the privacy policy of Google Analytics: <https://policies.google.com/privacy>
- **Facebook**, operated by Meta Platforms Ireland Ltd. with headquarters at 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland. The data is processed within the European Union. Further information can be found in Facebook's privacy policy at: https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0
- **Google DoubleClick**, operated by Google Ireland Ltd. with headquarters at Gordon House, Barrow Street, Dublin 4, Ireland. DoubleClick uses cookies to show you ads tailored to your interests. Your browser is assigned a pseudonymous identification number in order to check which advertisements have been displayed in your browser and which advertisements have been opened. The cookies do not contain any personal information. The use of DoubleClick cookies only enables Google and its partner websites to serve ads based on previous visits to our website or other websites on the Internet. The information generated by the cookies will be sent by Google to a server in the USA for analysis, where it will also be stored.
- **Additional recipients:** It is possible that additional recipients may be engaged on the respective gaming site who process personal data based on consent. These recipients are named in the cookie banner, which can be accessed at any time, and can be selected there.

We only share data that is necessary to carry out the mutual contract or if you have given us your consent, for example in connection with our newsletter or the cookie banner. If there is no contract yet, we share the data in certain cases within the scope of legitimate interests. This is the case, for example, if you simply want to visit our website or contact us. When you visit our website, it is in the interest of both parties to provide access to the offer and to communicate with each other.

We have also concluded data processing contracts with all external recipients in order to comply with European legal requirements. Depending on your location, some of the service providers mentioned above, if specified, will also transfer your data to the United States. In connection with the EU-US Data Privacy Framework (DPF), the European Commission has adopted a new adequacy decision in accordance with Art. 45 GDPR for data transfers to the USA. With this decision, the EU Commission recognizes that DPF-certified organizations in the USA have an equivalent level of data protection as the European Union. When selecting recipients, we check whether these requirements are met. In many cases, we have concluded additional data processing contracts called standard contractual clauses. We also review each service provider together with our data protection officer and ensure that additional security measures are in place, such as strong data encryption.

Data collection in our game apps

We collect and store certain data when you use our game apps in order to provide our games and services, improve your overall gaming experience, and provide you with tailored offers (e.g., certain offers in the game that you may like on the basis of your gaming behavior), including in particular:

- Device identifier (hash from device identifier and timestamp) as well as user-related device identifier (user IDs)
- Progress in the game and gaming behavior
- In-app purchases
- Game version
- Hardware
- Operating system
- Language settings
- Approximate location based on device language and time zone
- Date and time of gaming session

In order to protect your privacy, we delete or anonymize identifiers in our database and most technical data after your gaming session. All other data is kept exclusively for statistical purposes to optimize the game, to place interest-related advertising (further information can be found below under "personalized advertising"), and to offer a personalized gaming experience. **The purpose** of the temporary storage of this data is to establish a connection with our game servers, which is necessary for the provision of our games and services, as well as to offer you a more personalized gaming experience. **The legal basis** is the contract with you pursuant to Art. 6 (1) b) GDPR as well as the justified interest in accordance with the European data protection requirements pursuant to Art. 6 (1) f) GDPR. Moreover, we use the aforementioned security precautions to protect your data.

Apps and app permissions

When you download our games as mobile apps or purchase in-app items via an app platform, you transmit certain information to this platform, especially your account details, for example name, device identifier, email address, and payment information. We have no influence on this data collection and are not responsible for it.

Some functions of our games require access to certain functions and services on your device. Depending on the mobile operating system you use, it may be necessary to accept certain app permissions. We will now explain to you what these permissions are:

iOS

Push notifications: When you select "OK" in the pop-up window "Accept push notifications?", you allow the app to inform you about certain events in the game, even when the app is not currently open. You will then receive notifications in the form of audio tones, messages, and/or symbols (an image or a number on the app icon).

Game Center: We also offer a connection to the Game Center service by Apple, which is subject to the Apple data protection conditions available here: <https://www.apple.com/privacy>. When you use the service, for example in order to receive notifications about events, the personal information you disclose is visible to other players and can be read, collected, or used by them. You should consider which data you would like to provide.

Advertising ID: To carry out surveys, we or the service provider engaged for this purpose (Pollfish – <https://www.pollfish.com/gdpr/>) need access to the advertising ID of the end device. Access authorization is requested to this end.

Android

External storage (changing or deleting your external storage, reading the content of your external storage): These functions enable the app to temporarily store content on your device.

The app only uses its own memory space for this purpose. Other data on the external storage will not be deleted, changed, or read.

Internet connection (retrieving online data, displaying full network access, network, and Wi-Fi connections): These functions enable the app to access data from the Internet and determine whether there is a connection to the Internet via a Wi-Fi network or a mobile data connection. This serves to prevent large volumes of data from consuming the potentially limited data allowance.

Deactivate idle mode: This function allows the app to deactivate the idle mode of the phone (e.g. to display videos without deactivating the screen).

In order to protect your privacy, all app permissions are optional with the exception of the technical permissions that are necessary for running the app. You can reject them at any time (by clicking "no" or "do not accept"). You can also revoke the permissions retroactively by changing the corresponding settings in your device. **The purpose** of the request for these permissions is to keep you and the game up to date with regard to game updates, game-related news, and notifications. **The legal basis** is your consent in accordance with the European data protection requirements pursuant to Art. 6 (1) a) GDPR.

Advertising videos

We have integrated advertising videos in various places in our offers and games. Here, our advertising partners provide selected content that we display on their behalf. We wish to point out that our free-to-play system also depends on our advertising partners and we are committed to implementing this in the interest of our users. When you watch the displayed advertising videos, you may receive premium currency or game functions. Please contact our customer support if you have any further questions.

We work with the following providers:

unityAds

Moreover, we work with the partner Unity Technologies (Unity Technologies, 30 3rd Street, San Francisco, CA 94103, USA; Unity Technologies GmbH, Ritterstrasse 11, 10969 Berlin, Germany). Unity uses technologies to control and optimize the integration of advertising for the user. If you would like to object to the collection of anonymized information, you can do so via <https://unity3d.com/legal/cookie-policy#cookies>. Alternatively, you can configure or object to data processing in the game app via the "unity Privacy" link.

As a **security measure**, only pseudonymous usage data is processed and the user is granted a right to object. In addition, we have entered into an agreement with Unity in accordance with

Art. 26 GDPR, which stipulates that both Unity and we are responsible for the processing of your data.

For this reason, you can contact us or Unity if you have any questions about data processing. Contact details are available here: <https://unity3d.com/contact/addresses>

Unity has established Binding Corporate Rules (BCRs) between its own companies for the purpose of securing and justifying international data transfers. These concern data protection agreements that ensure that a consistent level of data protection exists in all companies.

The purpose of processing is to display advertising to enable our free-to-play 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 (1f) GDPR.

(Personalized) advertising

We use advertising technologies in our games and exchange non-personal identifiers with external advertising networks in order to improve the personalized advertising within our games. We and our partners collect and process the Apple advertising ID (IDFA) on iOS devices and the Google advertising ID on Android devices in order to enable interest-based advertising and measure the success of the aforementioned advertising. Advertising IDs are unique, yet non-personalized and non-permanent identification numbers that are provided by your operating system and device. The following explains how you can activate or deactivate the advertising technologies within the mobile apps:

iOS

Open the iOS application "Settings" and select the menu item "Data protection" and then "Advertising". When you activate the option "No ad-tracking", we are only able to take limited measures, such as identify unique users and prevent fraud. In the same menu, you can delete the IDFA ("Reset ad ID") at any time. A new ID will then be created, which is not linked with the data collected previously.

Android

Open the application "Settings" and select the menu item "Google". Depending on your device, this option may not be visible in the main menu, but you can use the search function at the top of the settings menu to find it. Next, select the sub-point "Ads" and activate the option "Deactivate personalized advertising" to prevent the creation of profiles and the display of interest-based advertising. In the same menu, you can delete the advertising ID ("Reset ad ID") at any time. A new ID will then be created, which is not linked with the data collected previously.

In order to protect your privacy, we only store personal data temporarily. In addition, the user can deactivate interest-based advertising in the device settings as described above.

Moreover, by entering into data protection agreements, we ensure that our external service providers are committed to a high level of data protection. **The purpose** here is to improve our games and offer you more personalized advertising. The collected information helps us to improve our websites and games as well as to keep our games free of charge for a broad player base. **The legal basis** is the legitimate interest according to the European data protection regulations pursuant to Art. 6 (1) f) GDPR, which we have evaluated together with our data protection officer. Besides this, a contract on data processing has been entered into with the external advertising networks in accordance with the requirements of Art. 28 GDPR.

Handling of children's data

We are aware of the importance of data security and the 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.

Last update of privacy policy: October 2023