

## **Headup GmbH Privacy Policy**

### **I. Name and address of the person responsible**

The responsible person within the meaning of the General Data Protection Regulation and other national data protection laws of the member states as well as other data protection regulations is the:

**Headup GmbH** Nordstr.  
102  
52353 Düren  
Deutschland  
**E-Mail:** [info@headupgames.com](mailto:info@headupgames.com)  
**Website:** <http://headupgames.com>

### **II. Name and address of the data protection officer**

Herr Frederik Bocklaff **c/o**  
**NIMROD Rechtsanwälte**  
Bockslaff Kupferberg GbR  
Emser Straße 9  
10719 Berlin  
**Tel.:** [+49 \(0\) 30 544 61 793](tel:+493054461793)  
**Fax:** +49 (0) 30 544 61 794  
**E-Mail:** [info@nimrod-rechtsanwaelte.de](mailto:info@nimrod-rechtsanwaelte.de)

### **III. Data processing**

In the following, we inform you about the collection of personal data when using our website, services and contact form. The service provider in accordance with § 13 of the German Telemedia Act and the responsible body in accordance with Art. 4 No. 7 DSGVO is Headup GmbH see I.

- 1)** Personal data is all data that can be related to you personally, for example name, address, email addresses, user behaviour. For the rest, we refer to Art. 4 No. 1 DSGVO, the legal definition.

In the case of mere information use of the website, i.e. if you do not log in to use the website, register or otherwise send us information, we do not collect any personal data with the exception of the data that your browser transmits to enable you to visit the website and this contact form.

These are:

- IP address
- Date and time of the request, time zone difference to GMT
- Content of the request (specific page)
- access status
- Amount of data transferred in each case
- Website from which the request came
- browser
- Operating systems and their interface
- Language and version of the browser software

If you use our contact form, additional:

- Name
- Email address

- 2)** Our website uses so-called cookies. These are small text files that are stored on your end device with the help of the browser. They do not cause any damage. We use cookies to make our website user-friendly. Some cookies remain stored on your end device until you delete them. They enable us to recognise your browser on your next visit. If you do not wish this, you can set your browser so that it informs you about the setting of cookies and you only allow this in individual cases.

We only use technically necessary cookies and no cookies from thirdparty providers.

### **3) Hosting**

Our site is hosted by:  
Bartels Schöne GmbH & Co. KG  
Mendelstr. 11  
48149 Münster  
Tel: +49 251 89959-0  
Fax: +49 251 89959-10  
www.bartels-schoene.de  
info@bartels-schoene.de

- 4)** We maintain up-to-date technical measures to ensure data security, in particular to protect your personal data from risks during data transmissions and from third parties gaining knowledge. These are adapted to the current state of the art.

## 5) Disclosure of data

Your personal data will not be transferred to third parties for purposes other than those listed below.

We will only share your personal information with third parties if:

- you have given your express consent in accordance with Art. 6 para. 1 sentence 1 lit. a DSGVO;
- the disclosure is necessary for the assertion, exercise or defence of legal claims pursuant to Art. 6 (1) sentence 1 lit. f DSGVO and there is no reason to assume that you have a predominantly legitimate interest in the non-disclosure of your data;
- there is a legal obligation for the disclosure in accordance with Art. 6 para. 1 sentence 1 lit. c DSGVO as well as;
- this is legally permissible and necessary for the processing of contractual relationships with you according to Art. 6 para. 1 p. 1 lit. b DSGVO.

## IV. Data processing in our games

In our games, we can track and analyse various actions at the player level to improve the game experience and the stability of the application. For example, the data collected allows us to check whether the application is working properly around the world. The data is also used to identify and fix software bugs when they occur. No data such as images, documents or other personal data unrelated to the application is accessed or collected by the application. Our collection and use of data helps to ensure that you can access your games as easily as possible and get the best service and gaming experience we have to offer.

This includes, in particular, contact data provided during registration and your actions in the game. In addition, we collect your connection data, such as the IP address. The processing of this information is necessary for the implementation of the game operation and is therefore carried out on the legal basis of Art. 6 Para. 1 Sentence. 1 Letter b DSGVO.

The personal data collected, used and processed is stored on our servers and on the servers of the following service providers cooperating with us.

You can view the privacy policy of the service providers at the following link:

- **Unity Software Inc.**, 30 - 3RD STREET SAN FRANCISCO CA 94103 415-539-3162 USA <https://unity.com/de>  
⇒ <https://unity.com/legal/game-player-and-app-user-privacy-policy>  
⇒ <https://docs.unity3d.com/Manual/UnityAnalyticsDataPrivacy.html>

- **Microsoft Azure PlayFab** - Microsoft Corporation, One Microsoft Way Redmond, WA 98052-6399 USA  
<https://azure.microsoft.com/de-de/products/playfab>  
 ⇒ <https://privacy.microsoft.com/de-de/privacystatement>

In addition to the data and information you provide directly to us, we collect non-personal information such as application usage statistics (for example, if and when an unsuccessful installation attempt occurred), information about your browser, operating system (for example, service pack, drivers, and supporting DLLs such as the DirectX version), information about hardware types, and about the processor (CPU).

As described above, this information is needed to provide you with an excellent, leading service. The application does not access or collect any data such as images, documents or other personal data unrelated to the performance of the application on your system. Our collection and use of this information helps to ensure that you can access your games with as few technical difficulties as possible and enjoy the best gaming experience we have to offer.

Below you will find the service providers, and their privacy policies, through which we collect this data:

- **Unity Analytics** - Unity Software Inc., 30 - 3RD STREET SAN FRANCISCO CA 94103 415-539-3162 USA <https://unity.com/de>  
 ⇒ <https://unity.com/legal/game-player-and-app-user-privacy-policy>  
 ⇒ <https://docs.unity3d.com/Manual/UnityAnalyticsDataPrivacy.html>
- **Codecks.io** - Codecks.io c/o Saftladen, Singerstraße 109, 10179 Berlin, Germany  
<https://www.codecks.io/>  
 ⇒ <https://www.codecks.io/privacy/>  
 ⇒ <https://www.codecks.io/tos/>
- **Microsoft Playfab Party** -  
 Microsoft Corporation, One Microsoft Way Redmond, WA 98052-6399 USA  
<https://learn.microsoft.com/dede/gaming/playfab/features/multiplayer/networking/>  
 ⇒ <https://playfab.com/privacy-terms/>  
 ⇒ <https://playfab.com/terms/>

You can decide for yourself during the installation of the application whether you agree to the collection of data and want to contribute to the stability of the application. If you do not agree, you can refuse the data collection.

Furthermore, you can also deactivate the data collection subsequently within the application. In the main menu, you will find the option to deactivate data collection under the menu item: "Settings / Share user data".

## **V. Rights of the data subject**

If your personal data is processed, you are a data subject within the meaning of the GDPR and you have the following rights vis-à-vis the controller:

- 1) if you have given consent to the use of data, to revoke this consent at any time;
- 2) to request information about the personal data concerning you at any time;
- 3) have the personal data concerning you corrected or deleted
- 4) restrict the processing of personal data relating to you;
- 5) to object to the processing at any time
- 6) to demand the return of the personal data concerning you on a data carrier.

Please send these requests to the following e-mail address:

[info@headupgames.de](mailto:info@headupgames.de)

We would also like to point out that, in accordance with Art. 13 (6) DSGVO, we may request additional information that is necessary to confirm your identity. In this way, we want to prevent unauthorised third parties from gaining knowledge of the data stored about you.