

## **Privacy Policy of Travian Games GmbH**

This is the Privacy Policy of Travian Games GmbH, Wilhelm-Wagenfeld-Str. 22, 80807 Munich, Germany (hereinafter: "TRAVIAN GAMES"). It applies to all websites and games operated by TRAVIAN GAMES and/or by its subsidiaries.

TRAVIAN GAMES shall handle all personal data which the user submits during the business relations strictly confidentially in compliance with all applicable data protection regulations. Details are provided in this Privacy Policy.

In the event that a link contained on the website operated by TRAVIAN GAMES redirects the user to another website not operated by TRAVIAN GAMES, TRAVIAN GAMES draws the user's attention to the fact that the present Privacy Policy does not apply to this third-party website. TRAVIAN GAMES is not responsible for how the operator of this website handles user data. In particular, TRAVIAN GAMES is not responsible for the website not operated by TRAVIAN GAMES not having same data protection standards as those that TRAVIAN GAMES offers its users. Hence, TRAVIAN GAMES recommends the user to carefully read the privacy policies of linked websites.

### **Which personal data does TRAVIAN collect, use and store?**

TRAVIAN GAMES collects, processes and stores the personal data which the user voluntarily submits to TRAVIAN GAMES by electronic or other means of communication (e.g. in standard forms or otherwise on the websites and games operated by TRAVIAN GAMES).

This includes data which the user provides to other users when communicating with them on the websites and games operated by TRAVIAN GAMES.

In order to register for the use of the games operated by TRAVIAN GAMES or in order to purchase a premium membership, the user must provide certain personal details, including his email address. If the user would like to purchase a premium membership for a user fee, this means that TRAVIAN GAMES will require further information from the user, such as his postal address, bank account and/or credit card information.

TRAVIAN GAMES advises the user to handle his data carefully and sparingly and to carefully consider what and with whom he would like to communicate via the websites and games operated by TRAVIAN GAMES. Certain information, e.g. communications between users, is also visible for other users of the websites and games operated by TRAVIAN GAMES.

Here are some examples of data stored by TRAVIAN GAMES:

When a user accesses the websites and games operated by TRAVIAN GAMES, TRAVIAN GAMES automatically stores the domain name and/or the IP-address of the computer via which the user contacts TRAVIAN GAMES, the date and the length of time spent on the websites and games operated by TRAVIAN GAMES and the pages of the websites and games operated by TRAVIAN GAMES accessed by the user.

TRAVIAN GAMES stores the user's email address. TRAVIAN GAMES may use it to send newsletters and information on the games of TRAVIAN GAMES to the user. The user may, of course, revoke his consent at any time in writing (e.g. by email) without incurring any costs, apart from the costs of transmitting the written revocation (at base rates). The user shall be given the opportunity in all information sent by TRAVIAN GAMES and in every newsletter to refuse to accept further information and to dispatch an appropriate revocation.

### **What does TRAVIAN GAMES do with the user's data?**

TRAVIAN GAMES collects, processes and stores the personal data of the user only insofar as TRAVIAN GAMES assumes that this reasonably serves legal business purposes. In other words: TRAVIAN GAMES collects, processes and stores the data of users so that TRAVIAN GAMES can better understand the users of the websites and games operated by TRAVIAN GAMES and thus offer them better services. For example, TRAVIAN GAMES may not only use the stored data to directly process

the licence agreement including all related possibilities of use (e.g. use of the games; participation in services related to the games; use of the services provided by customer support) but also in order to detect malfunctions or the abuse of websites and games operated by TRAVIAN GAMES.

For this reason, TRAVIAN GAMES will collect and store records which reflect how the websites and games operated by TRAVIAN GAMES are used, e.g. 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 abusive or improper activities of users. TRAVIAN GAMES uses special programs to detect infringements of the rules of the games, e.g. programs which can detect the use of unauthorized scripts and which can store the IP address and other data which the browser transfers as header information. Should TRAVIAN GAMES discover that a user is acting in breach of his contractual obligations, e.g. by using unauthorized scripts, TRAVIAN GAMES expressly reserves the right to merge the IP address of the respective user with other data which TRAVIAN GAMES has on this user in order to bring the infringement to the attention of the user. TRAVIAN GAMES might then take further steps against the respective user in order to restore regular game operations.

For the purpose of handling payments, TRAVIAN GAMES has the right to disclose user data to service providers instructed to collect the user fee insofar as this is necessary for the calculation of the fee and for settlement with the user. Furthermore, TRAVIAN GAMES is entitled to provide user data to third parties to whom receivables due to TRAVIAN GAMES from the user have been assigned provided that this is necessary to collect the receivables. TRAVIAN GAMES shall inform the user of the names of such third parties. If TRAVIAN GAMES cooperates with third parties in order to provide its services, TRAVIAN GAMES shall oblige such parties to comply with applicable data protection laws and to ensure adequate data protection.

TRAVIAN GAMES may also use the information provided by or stored on the user purely for internal checks as regards demography, user interests and user behaviour. This use is carried out anonymized. TRAVIAN GAMES may also statistically evaluate information on the user in an anonymized and aggregated form for advertising and market research. If and as far as TRAVIAN GAMES uses user data to create user profiles, TRAVIAN GAMES shall never pass on such profiles without the prior consent of the user and shall immediately stop such utilization of user profiles if the user objects to such use of his data.

Only after their prior consent shall TRAVIAN GAMES enable third parties to contact the user for advertising purposes. As long as the user does not object, his user data may also be used for sending the user advertising messages which reflect his interests (based on the information he has submitted to TRAVIAN GAMES and on his actions within the websites and games operated by TRAVIAN GAMES).

### **What other data do we collect and how are they used?**

Your web browser or your client software transfers geographic data, information on your computer (e.g. performance data, gaming data processing, type of browser) and data on the use of our products and services (e.g. time of login and logout). TRAVIAN GAMES uses these data to create summary statistics of its community. Furthermore, TRAVIAN GAMES can use these data for purposes of security and system integrity (e.g. to prevent hacking and cheating) or for purposes of prosecution. Please note that the use of your data may vary depending on the product and/or on the service. Please check the documentation of your game. TRAVIAN GAMES shall sometimes relate this information to your personal data, if TRAVIAN GAMES is of the opinion that our Terms of Use have been infringed or if TRAVIAN GAMES is ordered to do so by prosecuting authorities.

TRAVIAN GAMES will also request you to enter a user name and a password. TRAVIAN GAMES requests you not to use your real name, the name of another person or the name of a protected brand as a user name.

If you are a registered user, your details in TRAVIAN GAMES databases can be stored to adjust the website to your specifications, to transmit user-specific information on TRAVIAN GAMES, its partners or third-party providers or for other business purposes.

#### **What are IP (internet protocol) addresses and how does TRAVIAN GAMES use these?**

An Internet Protocol ("IP")-address is a unique identification number assigned to your server or the server of your Internet service provider ("ISP"). TRAVIAN GAMES ascertains IP-addresses in certain cases for purposes of system management, account authentication and system administration. TRAVIAN GAMES might also use IP-addresses to restrict access to the servers of the company and to exclude individual systems so that the abuse of these servers is prevented.

TRAVIAN GAMES might use these IP-addresses in connection with the data of a certain account or user if TRAVIAN GAMES is of the opinion that our Terms of Use have been infringed or if TRAVIAN GAMES is requested to do so by a judicial authority.

#### **Disclosure to third parties**

We treat your data strictly confidentially and do not disclose them to external third-parties. However, TRAVIAN GAMES might be legally obliged to disclose your data in individual cases, such as to investigating authorities, whereby data are then only disclosed as far as required by law.

TRAVIAN GAMES shall engage subsidiaries or sister companies or third parties to provide services on our behalf in an individual case. This particularly applies to payment processing via external service providers (Paypal, Global Collect etc.). These external companies are obliged to treat your data confidentially, safely and in accordance with the law and may only use your data insofar as this is required to perform their task.

#### **Amendments to or deletion of personal data**

The user may change his personal data at any time (e.g. in order to update or correct such data) or delete his personal data completely. If the user would like TRAVIAN GAMES to change his personal data or to stop using his data, the user may contact TRAVIAN GAMES at [privacy@traviangames.com](mailto:privacy@traviangames.com). TRAVIAN GAMES will then make the required changes or delete the user data as quickly as possible. However, TRAVIAN GAMES points out to the user that for technical or organizational reasons, some measures may still be carried out after the user has submitted his request for deletion, if such measures had already been initiated but not completed by that time.

#### **Information on personal data**

Upon request, TRAVIAN GAMES shall notify the user without delay of all personal data saved on him free of charge. This information will usually be provided electronically, normally by email.

TRAVIAN GAMES reserves the right to amend this Privacy Policy at any time, however TRAVIAN GAMES shall always observe the respectively applicable laws on data protection. TRAVIAN GAMES advises users to obtain information on the current Privacy Policy each time they visit websites and games. If TRAVIAN GAMES would like to use the personal data of users to a greater extent than previously, TRAVIAN GAMES shall, of course, notify users thereof in advance.

Should you have any general questions on this Privacy Policy and on data protection at TRAVIAN GAMES, please do not hesitate to contact us at the addresses shown below. Please state your user ID, email address and, if appropriate, the game played.

Data protection: [privacy@traviangames.com](mailto:privacy@traviangames.com)

Alternatively, you can send inquiries to our postal address:

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

### **Information for parents**

TRAVIAN GAMES is well aware that we bear a special responsibility for personal data provided to us by children. Hence, TRAVIAN GAMES recommends that parents tell their children never to actually enter their real names, addresses or telephone numbers without obtaining their parents' or their guardian's consent.

Children aged between 13 and 17 should ask their parents to read through these basic principles on personal rights and contact us if they would like to use the possibilities we have of restricting services or of voicing any concerns.

Minors under 18 may not register online for services subject to a charge without obtaining the prior consent of their parents or guardian. We kindly request parents and guardians to be particularly vigilant to ensure that their children do not break any laws while they use our websites or online services.

If you use services offered within the framework of the listed TRAVIAN GAMES websites, you agree to the principles of TRAVIAN GAMES concerning personal rights. If you do not agree to these principles, you should not use the services offered on these websites.

### **How safe are your personal data?**

TRAVIAN GAMES believes that it goes without saying that the data that you send us are protected and remain unchanged in their original form. Access to personal data is strictly monitored for this purpose. In addition, TRAVIAN GAMES will do its utmost to ensure that subsidiaries and third-party providers, to whom TRAVIAN GAMES might transfer your data, treat you with the same respect and focus on data security.

### **Third-party websites**

Our websites might contain advertising or services which are linked to other websites, such as Twitter, Facebook and YouTube. The fact that TRAVIAN GAMES creates a link to a website, does not constitute any endorsement, approval or opinion concerning our relation to this third party. If you click on the link to the website of a third party - which includes advertisements - you leave the TRAVIAN GAMES website you have accessed and change to the selected website. As TRAVIAN GAMES has no control at all over the activities of third parties, we refuse to accept any responsibility whatsoever for the use of your personal data by such third parties. Furthermore, TRAVIAN GAMES cannot guarantee that such third parties follow the same data protection and security practices as TRAVIAN GAMES. You should therefore read through the data protection regulations of all other

service providers whose services you use. Should you access the website of a third party which is linked to a TRAVIAN GAMES website, you should first note the data protection regulations of this website before you disclose any personal information.

### **Products offered in cooperation with third parties**

Users can register for other services from our website/websites. Certain products and/or services available on our website are offered to you in cooperation with third parties and might require that you state information serving to identify you, to register for those products and/or services and to ensure access to those products and/or services. Those products and/or services identify the third parties upon registration. If you register for those products and/or services the information serving to identify you is disclosed to those third parties and is subject to the data protection regulations and methods of those third parties. TRAVIAN GAMES assumes no responsibility for the data protection regulations and methods of those third parties. For this reason, you should note the data protection regulations and methods of those third parties before you provide the information serving to identify you in connection with those products and/or services.

### **Glossary**

To make this Privacy Policy easier to understand, the most important terms are briefly explained below:

#### **What are personal data?**

Personal data are data which identify the user. These data can be used to contact the user in reality or to locate him. These data include, for example, the user's correct name, email address, telephone number, postal address or credit card data.

#### **What are user data?**

User data are data which are collected, processed and stored by TRAVIAN GAMES when a user contacts the websites and games operated by TRAVIAN GAMES. Above all, user data are characteristics serving to identify the user (e.g. the domain name and/or the IP-address of the computer via which the user contacts TRAVIAN GAMES), information on the start and end and on the scope of the respective use of the websites and games operated by TRAVIAN GAMES and information on the accessed pages of the websites and games operated by TRAVIAN GAMES.

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