

## Privacy Policy

**Effective date: 28 January 2020**

Funcom Oslo AS and its subsidiaries and affiliates including Funcom Inc ("us", "we", or "our") operates the <https://www.funcom.com/privacy-policy/> website (hereinafter referred to as the "Service") as well as the following websites:

[funcom.com](https://www.funcom.com)

[secretworldlegends.com](https://www.secretworldlegends.com)

[anarchy-online.com](https://www.anarchy-online.com)

[ageofconan.com](https://www.ageofconan.com)

[theparkgame.com](https://www.theparkgame.com)

[longestjourney.com](https://www.longestjourney.com)

[mutantyearzero.com](https://www.mutantyearzero.com)

[conanexiles.com](https://www.conanexiles.com)

[hideandshriekgame.com](https://www.hideandshriekgame.com)

[moonsofmadness.com](https://www.moonsofmadness.com)

[conanchopchop.com](https://www.conanchopchop.com)

<https://www.metalhellsinger.com/>

and services for the following "live" games:

Age of Conan Unchained, Conan Exiles,

Anarchy Online and Secret World Legends

This page informs you of our policies regarding the collection, use and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

## **Definitions**

### **Service**

Service is the website operated by Funcom Oslo AS and the “live games” as listed above.

### **Personal Data**

Personal Data means data about a living individual who can be identified from those data (or from those and other information either in our possession or likely to come into our possession).

### **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

### **Cookies**

Cookies are small files stored on your device (computer or mobile device).

### **Data Controller**

Data Controller means the natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal information are, or are to be, processed.

For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

### **Data Processors (or Service Providers)**

Data Processor (or Service Provider) means any natural or legal person who processes the data on behalf of the Data Controller.

We may use the services of Funcom Inc and various Service Providers in order to process your data more effectively.

### **Data Subject (or User)**

Data Subject is any living individual who is using our Service and is the subject of Personal Data.

# Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to you.

## Types of Data Collected

### Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- Cookies and Usage Data
- IP Addresses

If you have opted in, We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or the instructions provided in any email we send or by contacting [privacy@funcom.com](mailto:privacy@funcom.com) with details of your opt out request.

### Usage Data

We may also collect information on how the Service is accessed and used ("Usage Data"). This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### Tracking Cookies Data

We use cookies and similar tracking technologies to track the activity on our Service and we hold certain information.

Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used such as beacons, tags and scripts to collect and track information and to improve and analyse our Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Service.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

**For more information on Cookies that Funcom uses, please visit:**

<https://www.funcom.com/cookie-policy>

## Use of Data

Funcom Oslo AS and its Data Processors uses the collected data for various purposes:

- To provide and maintain our Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so
- To provide customer support
- To gather analysis or valuable information so that we can improve our Service
- To monitor the usage of our Service
- To detect, prevent and address technical issues
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about if you have opted to receive such information

## Retention of Data

Funcom Oslo AS will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

Funcom Oslo AS will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

## Transfer of Data

Your information, including Personal Data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

## **Onward Transfer Liabilities**

Funcom is responsible for the processing of personal data it receives under the Privacy Shield Framework and subsequently transfers to a third party acting as an agent on its behalf. We comply with the Privacy Shield Principles for all onward transfers of personal data from the EU.

**Funcom Inc. complies with the EU – US Privacy Shield Framework and the Swiss – US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and United Kingdom, and Switzerland to the United States, respectively. We have certified to the Department of Commerce that we adhere to the Privacy Shield Principles. If there is any conflict between the terms in our privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>**

## **Our Policy on "Do Not Track" Signals under the California Online Protection Act (CalOPPA)**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **Your Data Protection Rights under the General Data Protection Regulation (GDPR)**

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Funcom Oslo AS aims to take reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Data.

If you wish to be informed about what Personal Data we hold about you and if you want it to be removed from our systems, please contact us at [privacy@funcom.com](mailto:privacy@funcom.com) .

The Data Controller is Funcom Oslo AS. The Data controller may be contacted at: [privacy@@funcom.com](mailto:privacy@@funcom.com) .

In certain circumstances, you have the following data protection rights:

**The right to access, update or delete the information we have on you.** Whenever made possible, you can access, update or request deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

**The right of rectification.** You have the right to have your information rectified if that information is inaccurate or incomplete.

**The right to object.** You have the right to object to our processing of your Personal Data.

**The right of restriction.** You have the right to request that we restrict the processing of your personal information.

**The right to data portability.** You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.

**The right to withdraw consent.** You also have the right to withdraw your consent at any time where Funcom Oslo AS relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

## Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), provide the Service on our behalf, perform Service-related services or assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## Disclosure of your information

We may share your personal information with the following third parties:

- External third-party service providers acting as processors who provide the following services:
  - Web hosting;
  - Metrics and analytics; and
  - Marketing, mailing and survey third party tool providers.

## **Google Ads (AdWords)**

Google Ads (AdWords) re-marketing service is provided by Google Inc.

You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads>

Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

## **Twitter**

Twitter re-marketing service is provided by Twitter Inc.

You can opt-out from Twitter's interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

## **Facebook**

Facebook re-marketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

## **Google Analytics**

Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>

### **Delta DNA**

For more information on the privacy policy of Delta DNA please see: <https://deltadna.com/privacy/>

- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- If Funcom or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- Disclosure for Law Enforcement. Under certain circumstances, Funcom Oslo AS may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
- Legal Requirements Funcom may disclose your Personal Data in the good faith belief that such action is necessary to:
  - To comply with a legal obligation
  - To protect and defend the rights or property of Funcom Oslo AS
  - To prevent or investigate possible wrongdoing in connection with the Service
  - To protect the personal safety of users of the Service or the public
  - To protect against legal liability
  - We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

### **Playfab**

<https://privacy.microsoft.com/en-us/privacystatement>

### **Payment Providers:**



We will not store or collect your payment card details. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

The payment processors we work with for “live games” are:

### **PayPal**

Their Privacy Policy can be viewed at <https://www.paypal.com/webapps/mpp/ua/privacy-full>

### **Hipay**

<https://hipay.com/en/terms>

### **XSolla**

<https://xsolla.com/privacypolicy>

## **Security of Data**

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **Links to Other Sites**

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

## **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## Oversight by Federal Trade Commission

We are subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission with respect to personal data received or transferred pursuant to the EU-U.S. Privacy Shield Framework including the onward transfer liability provisions. In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## Contact and Dispute Resolution

If you would like to place a request to modify or request a copy of your personal information in accordance with GDPR or other Privacy regulations or laws ; send requests to [privacy@funcom.com](mailto:privacy@funcom.com).

In compliance with the Privacy Shield Principles, Funcom commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact *us at* :

[privacy@funcom.com](mailto:privacy@funcom.com)

*or by physical mail to:*

***Funcom Privacy***

***Kirkegata 15,***

*Oslo, Norway N-0253*

Funcom has further committed to refer unresolved Privacy Shield complaints to [JAMS Privacy Shield Program](#), an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <https://www.jamsadr.com/eu-us-privacy-shield> for more information or to file a complaint. The services of JAMS are provided at no cost to you. Under certain conditions more fully described on the Privacy Shield website, you may be entitled to invoke binding arbitration through the Privacy Shield Panel when other dispute resolution procedures have been exhausted.

FUNCOM