

About Simplaex

Simplaex GmbH (“Simplaex”, “our”, “us”, “we”), through the Simplaex platform, deliver display and video advertisements to our Game Developer clients’ (“Game Developers”) user base (“End User”, “you”). These ads are selected through information provided by our Clients (“Game Developers” and “Brand Advertisers”), enabling content-rich advertisement that are more relevant to you.

1. Object of this Data Privacy Statement

Simplaex takes the privacy of the end user seriously.

This Data Privacy Statement explains the type of data that Simplaex collects, how we use these data and what safeguards we have put in place in order to ensure their protection.

Data protection concerns personal data, defined in Sec 3 para. 1 of the German Federal Data Protection Act (“Bundesdatenschutzgesetz”; “BDSG”) as any information concerning the personal and material circumstances of an identified or identifiable individual. This includes information like name, postal address, e-mail address or telephone number, but also usage data in some cases. Usage data is data required to use our website, for instance information about beginning, end and extent of website use.

2. Data Controller

The data controller within the meaning of the German Federal Data Protection Act (BDSG) is Simplaex GmbH, Klosterstraße 62, 10179 Berlin.

In case of questions related to the protection of data privacy, please contact us at our mailing address above or alternatively email us at privacy@simplaex.com. You can contact us at any time to ask questions about the protection of data privacy and to access, request the modification or deletion of your data that is stored by Simplaex.

3. Collection and Use of Information

When you visit a website operated by a Game Developer, Brand Advertiser or a third party site where we could serve an ad, we may collect some or all of the data described in this Privacy Notice. Our Simplaex platform uses this data as well as other data described within the Game Developers and Brand Advertisers Privacy Policies to help Game Developers and Brand Advertisers provide Ads that are more relevant to you, the end user.

We only collect, process and use personal data with your consent, as agreed by you through your relationship with Game Developers, unless we are already permitted to do so by statutory rules.

Some of the data we may collect and store is listed beneath.

Data regarding the End Users’ device:

- (i) Apple’s Identifier for Advertising (IFA) is a convention to allow advertising data collection while preserving user privacy; and
- (ii) Google Advertising ID is the equivalent concept for Android devices to allow advertising data collection while preserving user privacy; and
- (iii) Operating System (e.g. Android, IOS, Windows); and
- (iv) Type of device (e.g. Desktop, Smartphone, Tablet); and
- (v) Type of browser (e.g. Google Chrome, Safari); and
- (vi) Network Provider; and
- (vii) Geo-location of your device (i.e. Country); and
- (viii) IP Address.

Data Concerning Ads that have been served:

- (i) Basic details of the ad delivered (e.g. Game Developers' name, type of Advertising)
- (ii) The IP Address where the Ad was delivered; and
- (iii) The user's interaction with the ad (i.e. whether clicked, hid, muted, or otherwise interacted with ad); and
- (iv) Certain actions performed after clicking on the ad (Game Played, visited Game Developers' or Brand Advertisers website).

Simplaex may also use personal information collected from you for the following general purpose:

- (i) to fulfil client requests for Simplaex services; and
- (ii) to improve Simplaex and Simplaex services; and
- (iii) to analyse how you use online and mobile games, whose developers are users of our Services and how you interact with the Advertising of Game Developers and Brand Advertisers; and
- (iv) to prevent and detect fraud; and
- (v) to send clients information about Simplaex including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages; and
- (vi) to communicate with clients about products and services offered by Simplaex and our selected partners; and
- (vii) to enforce all Simplaex' Privacy Policies and the Simplaex Terms of Service, including to protect the rights, property or safety of Simplaex, its users, or any other person, or the copyright-protected contents of the Services; and
- (viii) to provide recommendations for improving advertising; and
- (ix) to conduct research.

The Collection of these data allows us to run campaigns to serve Ads that are more relevant to you. We also use the information to analyse performance of advertising campaigns for our clients and to provide performance reports. This information is aggregated in a non-detailed way, and neither our partners nor we combine the data collected by us with any other data that would enable our partners or us to personally identify you, the end user.

4. Sharing of information

We provide the data we collect only to the Users of our services that are strictly related with these data. We never share data with non-related parties such as other companies or individuals. The partners then may use the data for various purposes, such as targeting advertisements or other content targeting to visitors. We may also use some of the data we collect, that can be publically disclosed, to create industry reports, analyses, and similar materials that we may use for sales, marketing or other business purposes.

As described above, we share data only with the users of our services that are strictly related with these data. Data would only be shared with third parties, such as regulatory authorities and law enforcement officials, where this is required by law.

5. Cookies (including third party cookies), Tracking Pixels, and Related Technologies

In order to make the use of the Simplaex platform as simple and comfortable as possible to use, we use cookies, tracking pixels and related technologies to provide our services to Game Developers. Cookies are small data files that are served by our platform and stored

on the end users' device. They enable us to identify your device when you move between different websites and applications, so that we can serve targeted advertising to you.

Your internet browser can be set to generally reject cookies, however, this may restrict or make the use of the Simplæx platform impossible due to technical reasons.

6. Opt Out

We recognise how important online privacy is, so should you wish to opt-out from information being tracked and from targeted ads being served by us or on our behalf please follow the relevant undernoted instructions.

Online Users

To opt out from targeted ads being served by us or on our behalf please use our cookie opt-out on <https://tracker.simplaex.net/v1/opt-out>.

Please note that, if you delete your cookies or update your browser after having opted out, you will need to opt out again. Furthermore, if you use multiple browsers or devices you will need to execute this opt out on each browser or device.

Android Users

Enable "Opt out of interest-based ads" in the Ads setting of your Android device.

IOS Users

Enable "Limit Ad Tracking" in the Privacy/Advertising settings of your iOS Device.

7. Transmission of Data

We may, in the process of providing services, transfer information that we collect from Game Developers and Brand Advertisers about you, including personal information, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. If the Game Developer, Brand Advertiser or you are located outside the European Union with laws governing data collection and use that may differ from the EU law, please note that you are transferring information and permitting the transfer of information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and your consent to the transfer of information to the EU and the use and disclosure of information about you, including personal information, described in this Privacy Policy.

Your personal data will also be shared with third parties without your express prior consent only in the cases described below:

- (i) If it serves investigations of illegal use of the platform or is required to pursue legal claims, personal data may be shared with law enforcement agencies and third party victims. Such transfer of data will be made only where there is specific evidence for illegal or abusive conduct. Data may further be shared where it serves the enforcement of terms of use or other contractual agreements. We are furthermore legally obliged to disclose certain information to certain public entities upon request. Such entities include law enforcement agencies that investigate administrative offences subject to fines, and tax authorities.
- (ii) From time to time, we may require the assistance of contractually hired third parties and external service providers in order to provide our services, for instance in the domains of sending advertisements (only where you have explicitly consented beforehand), customer service and processing of payments (PayPal, credit card, etc.). In these cases, we share information with such companies or individuals to enable them to carry out their tasks. Such external service providers are carefully selected and regularly checked in

order to ensure your Privacy. Service providers may only use the data for the purposes specified by us. Service providers are furthermore contractually obliged by us to treat data strictly in accordance with this Privacy Policy and German Data Protection Law.

- (iii) As our business evolves, the structure of Simplaex may change, for instance by a change in legal form or creation, acquisition or sale of subsidiaries, branches or parts of a company. In the course of such transactions, customer data will be transferred together with the relevant part of the company being transferred. In each case of a transfer of personal data to third parties to the extent described above, we will ensure that such transfer is made in accordance with this privacy policy and applicable data protection law.

8. Changing and Deleting your Data

You can limit our use of the information collected about you or request we delete data by contacting us at the mailing address in section 2 or by email at privacy@simplaex.com. You may also do this by following the instructions outlined in the opt-out procedure in section 6 to limit the information we collect.

9. Data Security

The security of the information we collect is fundamental to Simplaex.

We process the information collected in accordance with German data protection law. All employees are obligated to maintain data secrecy and comply with the data protection regulations, and have been instructed accordingly.

The highest level of care is taken when collecting, processing, using and storing data. We take appropriate measures in order to protect the data under our control from unauthorised access, disclosure, alteration, or destruction. Furthermore, personal identifiable information is encrypted to ensure, in the unlikely event of the data being compromised, the End User is not identifiable.

10. Our Policy Regarding Children

The services are not directed to children under the age of 13. We do not knowingly collect Personal Information from Children under 13. If you are under 13, please disable the provision for information to us as described in Section 8, "Changing and Deleting your Data". If you become aware that your child has provided us with personal information without your consent, please contact us at privacy@simplaex.com.

11. Right to access and correction

Of course you are entitled, upon request, to full disclosure of that data we are storing regarding your personal data. You are also entitled to have any incorrect data corrected and rights to blocking or deletion. Please address any requests in such matters in writing to the above mailing address or email us at to privacy@simplaex.com.

12. Changes to privacy policy

We may make changes to this Policy from time to time when new technologies, industry practices, regulatory requirements or for other purposes as required. The most recent version of the privacy policy is always accessible at <http://www.simplaex.com/docs/privacy-policy-end-user.pdf>.

Should you have any additional questions or would like further information please write to us at the address shown in Section 2, or alternatively email us at to privacy@simplaex.com.