

Privacy Policy

Effective: July 9, 2018

This Privacy Policy describes how Quicksilver collects, uses and discloses information in connection with the use of our game application Gem Rush, and what choices you (the “**Customer**”) have with respect to the information.

Applicability Of This Privacy Policy

This Privacy Policy applies to Quicksilver’s Gem Rush game (the “**Game**”) and our Web presence (the “**Web Site**”). If you do not agree with these terms, do not access or use the Services or any other aspect of Quicksilver’s business.

Information We Collect And Receive

Quicksilver does not, in general, require any personal information related to Customers of the Game. In particular, we do not require Customers to provide us with contact information such as email addresses or phone numbers, although we allow the option of providing such information for the purpose of enabling certain forms of contact with Customers, such as password resets.

We may obtain and retain certain information that is necessary for the operation of the Game, such as access logs and error logs, but only for amounts of time required to ensure the proper and efficient operation of the Game. Such information is regularly purged as a part of the normal operation of the Game.

Quicksilver may collect and receive Customer Data and other information and data (“**Other Information**”) in a variety of ways:

- **Customer Data.** Customers may submit email addresses via an optional data entry form in the game to enable us to confirm your identity.
- **Game Login Data.** Customers are required to log in to the game in order to play. This requires either (a) a Steam ID and password, or (b) a unique user name and password.
 - I. The Steam ID is collected automatically by the system upon launching the Game. The Steam ID is a numerical value that does not, by itself, provide any information about the Customer’s real-world identity. We use the Steam ID only to create a unique account for each Customer, in order to be able to support online play.
 - II. In no case do we retain the Customer’s password in clear text; it is always stored in an obfuscated form and then is used only to verify the validity of the login credentials that were previously entered by the Customer. For their own safety, we recommend that Customers use a unique username and password for the Game that are different from the credentials that they use for other Games, Web Sites and Services, although we cannot require Customers to do so.
- **Other Information.** Quicksilver also collects, generates and/or receives Other Information:
 - I. Usage Information.
 - *Log data.* As with most websites and technology services delivered over the Internet, our servers automatically collect information when you access or use our Web Site and record it in log files. This log data may include the Internet Protocol (IP) address, the address of the web page visited before using the Game, browser type and settings, the date and time any such services were used,

- information about browser configuration and plugins, language preferences and cookie data.
- *Device information.* Quicksilver may collect information about devices accessing the Services, including type of device, what operating system is used, device settings, application IDs, unique device identifiers and crash data. Whether we collect some or all of this Other Information often depends on the type of device used and its settings.
 - *Location information.* We do not collect location information from you.
- II. **Cookie Information.** Quicksilver uses cookies and similar technologies in our Web Site that help us provide a good user experience while using the Game, but we do not use this information for purposes other than ensuring efficient operation of the Game.
 - III. **Contact Information.** In accordance with the consent process provided by your device, any contact information that a Customer chooses to provide may be retained in order to allow us to provide requested information.
 - IV. **Additional Information Provided to Quicksilver.** We receive Other Information when submitted via the Game or if you participate in a focus group, contest, activity or event, apply for a job, request support, interact with our social media accounts or otherwise communicate with Quicksilver via our Web site.

Generally, no one is under a statutory or contractual obligation to provide any Customer Data or Other Information (collectively, “**Information**”). However, certain Information is collected automatically and, if some Information is not provided, we may be unable to provide the full range of services available in the Game. For example, if no email address is provided, we will not be able to reset your password.

How We Use Information

Customer Data and Game Login Data will be used by Quicksilver in accordance with Customer’s instructions, including any applicable terms in the Customer license agreement for the Game, and as required by applicable law. Quicksilver is a processor of Customer Data and Customer is the controller.

Quicksilver uses Game Login Data in furtherance of our legitimate interests in operating the Game. More specifically, Quicksilver uses Game Login Data:

- **To allow users to play the Game.** In order for us to be able to record game activity and enable online play, we must maintain unique accounts for each Customer. Such accounts maintain only enough information to perform such functions. Game Login Data is used only to create and maintain such Customer accounts and, if an email address is provided, to enable resetting of the user’s password.
- **As required by applicable law, legal process or regulation.**
- **To investigate and help prevent security issues and abuse.**

Quicksilver uses Other Information in furtherance of our legitimate interests in operating our Services, Websites, Games and business. More specifically, Quicksilver uses Other Information:

- **To provide, update, maintain and protect our Web Site and business.** This includes use of Other Information to support delivery of the Services under a Customer Agreement, prevent or address service errors, security or technical issues, analyze and monitor usage, trends and other activities or at a Customer’s request.
- **As required by applicable law, legal process or regulation.**
- **To communicate with you by responding to your requests, comments and questions.** If you contact us, we may use your Other Information to respond.
- **To send emails and other communications, if an email address was provided to us.** We may send you service, technical and other administrative emails, messages and other types of

communications. We may also contact you to inform you about changes in our offerings, and important Web Site-related notices, such as security and fraud notices. These communications are considered part of the Web Site and Game and you may not opt out of them.

- **To investigate and help prevent security issues and abuse.**

If Information is aggregated or de-identified so it is no longer reasonably associated with an identified or identifiable natural person, Quicksilver may use it for any business purpose. To the extent Information is associated with an identified or identifiable natural person and is protected as personal data under applicable data protection law, it is referred to in this Privacy Policy as “**Personal Data.**”

Data Retention

Quicksilver will retain Customer Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Game and Web Site functionality, and as required by applicable law. The deletion of Customer Data and other use of the Game by Customer may result in the deletion and/or de-identification of certain associated Other Information. Quicksilver may retain Other Information pertaining to you for as long as necessary for the purposes described in this Privacy Policy. This may include keeping your Other Information after you have deactivated your account for the period of time needed for Quicksilver to pursue legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements.

How We Share And Disclose Information

This section describes how Quicksilver may share and disclose Information. Customers determine their own policies and practices for the sharing and disclosure of Information, and Quicksilver does not control how they or any other third parties choose to share or disclose Information.

- **Customer’s Instructions.** Quicksilver will solely share and disclose Customer Data in accordance with a Customer’s instructions, including any applicable terms in the Customer Agreement and Customer’s use of Game or Web Site functionality, and in compliance with applicable law and legal process.
- **Customer Access.** Administrators may be able to access, modify or restrict access to Other Information. This may include, for example, exporting logs of Game or Web Site activity or emails sent.
- **Corporate Affiliates.** Quicksilver may share Other Information with its corporate affiliates, parents and/or subsidiaries.
- **During a Change to Quicksilver’s Business.** If Quicksilver engages in a merger, acquisition, bankruptcy, dissolution, reorganization, sale of some or all of Quicksilver’s assets or stock, financing, public offering of securities, acquisition of all or a portion of our business, a similar transaction or proceeding, or steps in contemplation of such activities (e.g. due diligence), some or all Other Information may be shared or transferred, subject to standard confidentiality arrangements.
- **Aggregated or De-identified Data.** We may disclose or use aggregated or de-identified Other Information for any purpose. For example, we may share aggregated or de-identified Other Information with prospects or partners for business or research purposes, such as measuring time spent on our Web Site or in the Game.
- **To Comply with Laws.** If we receive a request for information, we may disclose Other Information if we reasonably believe disclosure is in accordance with or required by any applicable law, regulation or legal process.
- **To enforce our rights, prevent fraud, and for safety.** To protect and defend the rights, property or safety of Quicksilver or third parties, including enforcing contracts or policies, or in connection with investigating and preventing fraud or security issues.

- **With Consent.** Quicksilver may share Other Information with third parties when we have consent to do so.

Security

Quicksilver takes security of data very seriously. Quicksilver works hard to protect Other Information you provide from loss, misuse, and unauthorized access or disclosure. These steps take into account the sensitivity of the Game Login Data and Other Information we collect, process and store, and the current state of technology. Given the nature of communications and information processing technology, Quicksilver cannot guarantee that Information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others.

Age Limitations

To the extent prohibited by applicable law, Quicksilver does not knowingly request personal information from anyone younger than 16 years old. If you learn that anyone younger than 16 has unlawfully provided us with personal data, please contact us and we will take steps to delete such information.

Changes To This Privacy Policy

Quicksilver may change this Privacy Policy from time to time. Laws, regulations and industry standards evolve, which may make those changes necessary, or we may make changes to our business. We will post the changes to this page and encourage you to review our Privacy Policy to stay informed. If we make changes that materially alter your privacy rights, Quicksilver will provide additional notice, such as via email or through the Game. If you disagree with the changes to this Privacy Policy, you should discontinue use of our Web Site.

Data Protection Officer

To communicate with our Data Protection Officer, please email gdpr@quicksilver.com.

Identifying The Data Controller And Processor

Data protection law in certain jurisdictions differentiates between the “controller” and “processor” of information. In general, the Customer is the controller of Customer Data. In general, Quicksilver is the processor of Customer Data and the controller of Other Information.

Your Rights

Individuals located in certain countries, including the European Economic Area, have certain statutory rights in relation to their personal data. Subject to any exemptions provided by law, you may have the right to request access to Information, as well as to seek to update, delete or correct this Information. You can do this by contacting us via email at gdpr@quicksilver.com.

To the extent that Quicksilver’s processing of your Personal Data is subject to the General Data Protection Regulation, Quicksilver relies on its legitimate interests, described above, to process your data. Quicksilver may also process Other Information that constitutes your Personal Data for direct marketing purposes and you have a right to object to Quicksilver’s use of your Personal Data for this purpose at any time.

Data Protection Authority

Subject to applicable law, you also have the right to (i) restrict Quicksilver's use of Game Login Data and Other Information that constitutes your Personal Data and (ii) lodge a complaint with your local data protection authority or directly with Quicksilver at gdpr@quicksilver.com.

Contacting Quicksilver

Please feel free to contact Quicksilver if you have any questions about this Privacy Policy or Quicksilver's practices, or if you are seeking to exercise any of your statutory rights. You may contact us at gdpr@quicksilver.com.