

Privacy Policy

1. Preamble

The administrator of the personal data, the principles of processing of which are described in this document, is the Stream Cards S.A., seat: ul. Burakowska 5/7, 01-066 Warsaw, Poland, Tax NIP ID 5272827176; REGON ID 368745605 registered at the District Court for the Capital City of Warsaw, XIII Commercial Division National Court Register; KRS registration number: 0000703366 (hereinafter: **"Company"**; **"Controller"**; **"We"**). To contact us, please send an email to the following email address: privacy@streamcards.gg or by post to the Company's registered office address.

The Company is the operator of the website <https://www.streamcards.gg/> (hereinafter: **"Website"**) and Twitch extension called StreamCards, available at: <https://www.twitch.tv> (hereinafter: **"StreamCards Extension"**).

Please note that **"You"**, **"Your"**, and **"Yourself"** in this document refers the User i.e. to anyone who uses our Services, including registered users, general visitors to our Website, and anybody who so much thinks of clicking on our Website;

In the course of the various processing activities, the Company works as a controller within the meaning of Article 4(7) of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter: **"General Data Protection Regulation"**; **"GDPR"**).

All data is processed exclusively according to the applicable data protection regulations. The Controller shall make every effort to ensure that all the actions taken by him in connection with personal data are in line with the law and to ensure the greatest possible protection of Your privacy.

The Company uses Your personal data to enable You to claim the services of Company that require registration. Without Your consent, Company will not disclose personal data to third parties for advertising or other purposes.

We collect personally identifiable information from Users in a variety of ways, including, but not limited to, when users visit our website (<https://www.streamcards.gg/>), register, place an order, sign up for a newsletter, fill out a form, in connection with other activities, services, features or resources we make available on our website.

In the Privacy Policy the Controller presents the most important information concerning the principles of personal data processing. It indicates the key groups of persons whose data is collected by the Administrator and explains the purposes for which the Administrator collects the data, the legal basis on which the data is processed and how long the data is stored. We also inform the persons whose data we process about them about their rights.

The Privacy Policy also includes the Cookie Policy.

The Controller shall apply appropriate technical and organisational measures to make Your personal data secure, including protecting Your personal data against unauthorised access, loss or destruction. Appropriate personal, organisational, technical (IT) and physical security measures have been implemented to ensure the security of personal data.

This Privacy Policy applies to all services offered by the Company, as well as to the processing of personal data via StreamCards' social media.

2. Minors/Statement on the COPPA

The Website and the StreamCards Extension contain information which is not addressed to minors (persons below the age of 16). This website as well as services and websites related thereto are not intended for minors, and Controller does not knowingly collect data about minors.

Our Terms of use prohibit users aged under 16 years from accessing our Services. In the event that we learn that we have collected personal information from minors under 16 years of age we will delete that information as soon as possible. If You believe that we might have any information from or about minors under 16 years of age please contact us at privacy@streamcards.gg

3. What are Your data protection rights?

The Company would like to make sure You are fully aware of all of Your data protection rights. Every user is entitled to the following:

- **The right to access** – You have the right to request from the Company copies of Your personal data. Detailed rules are specified in GDPR;
- **The right to rectification** – You have the right to request that the Company correct any information you believe is inaccurate. You also have the right to request the Company to complete the information you believe is incomplete. Detailed rules are specified in GDPR;
- **The right to erasure** – You have the right to request that the Company erase Your personal data, under certain conditions specified in GDPR;
- **The right to restrict processing** – You have the right to request that Company restrict the processing of your personal data, under certain conditions specified in GDPR;
- **The right to object to processing** – You have the right to object to the Company's processing of Your personal data, under certain conditions specified in GDPR;
- **The right to data portability** – You have the right to request that the Company transfer the data that we have collected to another organization, or directly to You, under certain conditions specified in GDPR.

If You make a request, we have one month to respond to You. If You would like to exercise any of these rights, please contact us at our email: privacy@streamcards.gg.

4. Data protection officer

Please note that Controller has appointed an internal data protection officer for You to contact if You have any questions or concerns about our personal data policies or practices - Daniel Sieadzan.

The email of Company's data protection officer is daniel@streamcards.gg.

5. Purpose of the data processing

StreamCards brings an innovative, on stream game based on the underlying title for esports tournament streams, allowing viewers to engage further with what's happening in a tournament match. StreamCards is an overlay extension for Twitch allowing tournament viewers to make predictions in the form of a card game.

The purpose of Company is to monetize our services including (but not limited to) providing the StreamCards Extension to the Twitch channel (esports tournament broadcasters), product placement of esports tournament sponsors in the StreamCards Extension, cooperating with esports tournament broadcasters and to allow stream viewers to collect digital trading cards on the website (<https://www.streamcards.gg/>) and in the StreamCards Extension.

The Company process data about You for the purposes set forth in the developer agreement (available at: <https://www.twitch.tv/p/pl-pl/legal/developer-agreement/>). We encourage You to visit Twitch's website to review any privacy policy posted by the Twitch (available at:

<https://www.twitch.tv/p/en/legal/privacy-notice/>), which may include additional information on privacy practices.

The Company uses information about You to operate, maintain, enhance, provide, create, and develop all of the features, functionality, and services (new or existing) found on the Website and in the StreamCards Extension; provide security for our websites, products, software, or applications; manage relationships with Twitch account holders, including making or receiving payment; improve users' experience; and participate in online games.

We use Your email address to communicate with You, including to notify You of major Services updates, for customer service purposes, or to contact You regarding any content that You have posted to. Note that we may still send You additional informational or transactional notifications.

We may also ask for Your consent to process Your personal information for a specific purpose that we communicate to You. When you consent to our processing Your personal information for a specified purpose, You may withdraw Your consent at any time and we will stop the processing of Your data for that purpose.

The Company may, after receiving Your prior consent, periodically send promotional materials or notifications to You related to our Services.

In certain cases, we have a legal obligation to collect and process Your personal information

The Company will rely on legal grounds to process Your personal information to the extent permitted by applicable law, which may include, without limitation: to honor contractual commitments, to take steps in anticipation of entering into contract, to fulfill legal obligations, Your consent, and Twitch's legitimate interests.

6. Privacy statements for various processes

6.1. What is personal data?

Personal data is information that can identify You as a person or draw conclusions about Your personal or factual circumstances.

6.2. Information on the use of our offer as an unregistered user

As a non-registered user, You will not store any personal data in the sense of the GDPR, except for data that you provide to us when contacting us.

6.2.1. Use of cookies on the Website

By using the Website and the StreamCards Extension, You agree to the use of cookies as explained below. Due to the importance of privacy, You will find below more information about cookies and how the Company uses these cookies. In addition, we give You an easy way to disable the use of cookies.

6.2.2. What are cookies?

Cookies are small text files which are downloaded for optimal use of websites on Your computer or mobile device. As long as registration did not take place, our system recognizes at the cookie only the combination computer / browser again (indirectly personal data).

6.2.3. How do we use cookies?

Any user information collected through the cookies is not linked to a natural person as long as there is no registration. We store the data obtained for the following use cases:

- Settings: Some functions of our Services require cookies for user-specific settings;

- Statistics: In order to better understand our users, we use cookies for statistical purposes without using or disclosing any personal information (e.g: Google Analytics Cookie),
- Advertising: Cookies are stored for certain user actions in order to be able to display this advertising as relevant to this user as possible.

This website uses Google Analytics to collect statistics and Google Search Console.

Google Analytics is a web analytics service provided by Google LLC. Google Analytics uses cookies to help the website analyse how users use the site. Please read the details of Google Analytics' privacy policy (available at: <https://policies.google.com/privacy?hl=pl>).

1.1.4. Use and deactivation of cookies for displaying individual content (remarketing & retargeting)

Our Websites use so-called "retargeting tags", which are JavaScript elements that can be found in the source code of the website. When a user visits a page on the sites that has a "retargeting tag" an online advertising provider (Google, etc.) places a cookie on the user's computer, which in turn maps to specific retargeting audience lists becomes.

If a Company retargeting campaign is switched to other websites ("interest-based advertising"), this cookie will be used. Third-party online advertising providers (such as Google) use these cookies to match ad serving to previous users' visits to the Website. These third parties do not collect any personally identifiable information about users, such as names, postal and e-mail addresses, or telephone numbers. Google's use of cookies may also be disabled by users of our site by accessing "Google Ads Preferences."

1.1.5. Disabling the use of cookies

You can disable the use of cookies in most browsers directly in the settings. However, this may impair or completely prevent the functionality of the Website.

In order to make it easier for You to deactivate cookies, we provide below the direct links to deactivate cookies in Your browser (disable cookies in Google Chrome, Internet Explorer, Mozilla Firefox)).

The User may delete already stored cookies from his/her terminal device through appropriate browser functions or other software and applications designed for this purpose. The methods for deleting cookies in the various browsers can be found, among others, at the following addresses:

- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Mozilla Firefox: <http://support.mozilla.org/pl/kb/usuwanie-ciasteczek>
- Microsoft Internet Explorer: <http://support.microsoft.com/kb/278835/pl>
- Microsoft Edge: <https://support.microsoft.com/pl-pl/help/4027947/microsoft-edge-delete-cookies>
- Opera: <https://help.opera.com/pl/latest/security-and-privacy/>
- Safari: <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>

If You have any further questions about the use of cookies, please contact privacy@streamcards.gg.

1.3. Privacy statement in connection with the registered use as a user

1.3.1. Account creation

If You use our Services, we will create an account automatically from Your Twitch public data. Any additional data related to Your account will only contain data useful for the Service.

1.3.2. Data that we share with Third-Parties and why

One of our goals in the creation of this service is to provide tools to help You to create engaging interactive content.

Some of these features are monetized in order to help us keep some services free and to ensure the continued development of the many free tools we provide to the gaming community. For detailed information, please refer to the Twitch Privacy Policy (available at: <https://www.twitch.tv/p/pl-pl/legal/privacy-notice/>).

Below is a list of the data Twitch shares with us. This list is not guaranteed to be exhaustive and we do not endorse nor take any responsibility for the content or information contained therein. We do not share any of Your data that these third parties share with us.

- Twitch ID,
- username,
- account email.

1.1.3. What other data could be collected in the course of registered use?

Basic data:

- IP address
- E-mail
- Surname
- phone number
- gender
- Date of birth
- nationality
- residential address
- Geolocation details including region, country, state, city;
- Twitch Account
- Twitter Account
- Mixer Account
- YouTube Profile
- Facebook Account
- Discord Profile

In addition, we store personally identifiable information of Yourself collected between You and the Company as part of the ongoing correspondence and activity (e-mails, chat messages, search settings, etc.).

1.1.4. How do we collect data?

You directly provide the Company with most of the data we collect. We collect data and process data when You:

- Register online;
- Voluntarily complete a customer survey or provide feedback on any of our message boards or via email;
- Use or view our Website via Your browser's cookies;
- Use or view our social media accounts.

1.1.5. How will we use Your data?

The Company collects Your data so that we can:

- Provide You our Services (the Website and the StreamCards Extensions);
- Process Your order and manage Your account;
- Email You with special offers on other products and services we think You might like;
- Manage our social media accounts.

In addition, we point out that, after Your prior consent, we will send You electronic news about updates, new features and offers from the Company. In addition, we process Your e-mail address and Your name. The sending of such electronic messages can be denied at any time by e-mail to privacy@streamcards.gg.

When the Company processes Your order, it may send Your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

1.1.6. What is the legal basis on which we process Your data?

We process Your personal data based on the following legal grounds:

- Your consent to the processing of Your personal data;
- processing is necessary for the performance of a contract to which You are a party or in order to take steps at Your request prior to entering into a contract;
- our legitimate interests, which are: to ensure that the Services are safe and that You can properly use them, to enhance and personalize Your user experience, to defend against potential claims or to pursue claims, to manage our social media accounts and to provide You with an answer to Your request.

1.1.7. Transfer of data to third parties

Data collected in the course of registration will not be passed on to third parties by the Company without Your consent.

To assist in the provision of our services, we use sub-processors who provide services (such as hosting, software tools, marketing and legal services) for us. As part of these activities, these processors can access Your data. The Company contractually obligated all such subcontractors to comply with applicable privacy policies, as well as the privacy and confidentiality provisions of this agreement.

Furthermore, the Company may, for legal reasons, be obliged to disclose the data if this is necessary for the assertion, exercise or defense of legal claims before an authority.

Your data may be processed, stored or transferred outside your country of residence or outside the European Economic Area (EEA) and Switzerland to countries such as the United States. Privacy laws in these countries may not offer the same level of protection as in your country or the EEA. However, if we share your data outside the EEA and Switzerland, we will ensure an adequate level of protection for your data and will rely on legally recognized grounds for sharing such as EU standard contractual clauses and/or other lawful means of data portability and ensuring adequate protection of personal data. Information used in order to process payments

When users buy products or services through the Website, those users submit the following information to our payment processors, Adyen N.V. :

- Your name and surname;
- Your address;
- Your date of birth (if required);
- Your nickname; and
- Your billing information.

If in doubt on the usage of Your payment information, please refer to Adyen N.V. Privacy Policy available at https://www.adyen.com/pl_PL/policies-and-disclaimer/privacy-policy.

1.1.9. Information we receive from third-party sites you connect to our Service

We may receive personal information about you from third parties and combine that with the information we collect through our service. In many cases we offer a social login option. This way you can use your Twitch, Youtube, Facebook or other third party account to access our services. When you choose this option we receive information about you through the third party API of the third party you chose to use. These third party services will authenticate your identity and provide you the option to share certain personal information with us, which could include your name, email address, address book and contacts, or other information. Data is gathered strictly in accordance with the social media terms and conditions, so check your privacy settings on Your social media accounts.

1.1.10. Storage duration / deletion period

The data will be stored until You delete Your StreamCards' account and until the limitation period for potential claims. In addition, where the legal basis for the processing of Your data is Your consent, we process Your data until You withdraw Your consent, and where the legal basis for the processing is a legitimate interest, we process Your data for the period that enables us to pursue that interest or until You make an effective objection to the processing.

1.1.11. Use of cookies on the Website

By using the Website and the StreamCards Extension, You agree to the use of cookies as explained below. Due to the importance of privacy, You will find below more information about cookies and how the Company uses these cookies. In addition, we give You an easy way to disable the use of cookies.

1.1.12. What are cookies?

Cookies are small text files which are downloaded for optimal use of websites on Your computer or mobile device. As long as registration did not take place, our system recognizes at the cookie only the combination computer / browser again (indirectly personal data).

1.1.1. How are cookies used?

Any user information collected through the cookies is not linked to a natural person as long as there is no registration. We store the data thus obtained for the following use cases:

- Settings: Some functions of our Services require cookies for user-specific settings;
- Statistics: In order to better understand our users, we use cookies for statistical purposes (e.g: Google Analytics Cookie). ;
- Advertising: Cookies are stored for certain user actions in order to be able to display this advertising as relevant to this user as possible.

This website uses Google Analytics to collect statistics and Google Search Console.

Google Analytics is a web analytics service provided by Google LLC. Google Analytics uses cookies to help the website analyse how users use the site. Please read the details of Google Analytics' privacy policy (available at: <https://policies.google.com/privacy?hl=pl>).

1.1.14. Use and deactivation of cookies for displaying individual content (remarketing & retargeting)

Our Websites use so-called "retargeting tags", which are JavaScript elements that can be found in the source code of the website. When a user visits a page on the sites that has a "retargeting tag," an online advertising provider (Google, etc.) places a cookie on the user's computer, which in turn maps to specific retargeting audience lists becomes.

If a Company retargeting campaign is switched to other websites ("interest-based advertising"), this cookie will be used. Third-party online advertising providers (such as Google) use these cookies to

match ad serving to previous users' visits to the Website. These third parties do not collect any personally identifiable information about users, such as names, postal and e-mail addresses, or telephone numbers. Google's use of cookies may also be disabled by users of our site by accessing "Google Ads Preferences."

1.1.15. Disabling the use of cookies

You can disable the use of cookies in most browsers directly in the settings. However, this may impair or completely prevent the functionality of the Website.

In order to make it easier for You to deactivate cookies, we provide below the direct links to deactivate cookies in Your browser (disable cookies in Google Chrome, Internet Explorer, Mozilla Firefox)).

The User may delete already stored cookies from his/her terminal device through appropriate browser functions or other software and applications designed for this purpose. The methods for deleting cookies in the various browsers can be found, among others, at the following addresses:

- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=pl&answer=95647>
- Mozilla Firefox: <http://support.mozilla.org/pl/kb/usuwanie-ciasteczek>
- Microsoft Internet Explorer: <http://support.microsoft.com/kb/278835/pl>
- Microsoft Edge: <https://support.microsoft.com/pl-pl/help/4027947/microsoft-edge-delete-cookies>
- Opera: <https://help.opera.com/pl/latest/security-and-privacy/>
- Safari: <https://support.apple.com/pl-pl/guide/safari/sfri11471/mac>

If You have any further questions about the use of cookies, please contact privacy@streamcards.gg.

1.1.16. Analysis tools for product development

To continually improve the Company's products, we use a variety of analysis tools to record and evaluate interactions from randomly selected, unique visitors to our platforms. There are e.g. Mouse movements and clicks recorded with the aim to show improvement possibilities of the respective website. In addition, information about the operating system, browsers, incoming and outgoing references, geographic origin, as well as the resolution and type of the device are evaluated for statistical purposes.

This information will not be disclosed to third parties and will only be stored for a maximum of one month. The recording of this data can be deactivated by setting the DoNotTrack header in the browser.

Currently the following providers are used:

- Google Analytics – You can check [here](#) how Google may process Your data.

1.1.17. Privacy Policy of other websites

The Website and the StreamCards Extension may contain links to other websites. Our privacy policy applies only to our websites, so if You click on a link to another website, You should read their privacy policy.

7. Profiling

Stream Cards does not perform profiling.

8. Security

We will take all reasonable technical and organizational precautions to prevent the loss misuse or alteration of Your personal information. For example, our databases are password protected and

limited to essential employees only (such as the Company management or employees whose main role requires system access).

Please be aware that, although we endeavour to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

9. Revocation, changes, corrections, updates and complaints to the Data Protection Authority

The consent to the use and storage of personal data can be revoked at any time by sending a message to privacy@streamcards.gg. In addition, the user has the right to information, correction of incorrect data, blocking, data transferability and deletion of his personal data, as far as no legal duty to protect against.

Furthermore, one can complain to the data protection authority if we do not comply with data protection requirements - Polish Data Protection Authority, <https://uodo.gov.pl/>, ul. Stawki 2, 00-193 Warsaw, Poland, email: kancelaria@uodo.gov.pl.

Additional information about privacy can be found by email at privacy@streamcards.gg.

10. Changes to our privacy policy

The Company keeps its privacy policy under regular review and places any updates on this web page.

This privacy policy was last updated on 14.04.2021.