

GENERAL PRIVACY POLICY

Updated 15.04.2022

The following Privacy Policy was designed for Emeroth Project's presentation website and it will be reviewed and updated periodically according to all applicable laws and regulations.

This Privacy Policy is applicable and refers to the data processed through the website www.catacombcrawlers.com and its own subdomains.

The purpose of this Privacy Policy is to easily inform you about:

- **The definitions of the terms provided by the GDPR.**
- **Who is Emeroth Project**
- **Where can you find us and how can you contact us**
- **What personal data Emeroth Project may process about you, how your personal data are processed by Emeroth Project, the purpose, legal basis and period of the processing**
- **The disclosure of your personal data to third parties**
- **Which are your rights and how can you effectively exercise them**
- **Children's personal data – *we do not process data for children under 16 years old***
- **What security precautions does Emeroth Project have in place to protect your personal data**
- **Links to other websites**
- **Updates to the privacy policy**
- **Information concerning Data Protection Supervisory Authority**

- **The definitions of the terms provided by the GDPR**

NSAPDP represents The National Supervisory Authority for Personal Data Processing, the Romanian independent public authority responsible for the compliance with the protection of personal data requirements;

Personal data represents any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Processing represents any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission,

dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Restriction of processing represents the marking of stored personal data with the aim of limiting their processing in the future;

Controller represents the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by the European Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Processor represents a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;

Recipient represents a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether it is a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with the European Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;

Third party a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data;

Data Breach represents a breach of security leading to the accidental or unlawful destruction, loss, alteration, or unauthorized disclosure of, or access to, personal data. This means that a breach is more than just losing personal data.

- **Who is Emeroth Project?**

Emeroth Project refers to the technical infrastructure and all data processes performed through www.catacombcrawlers.com presentation website which is managed by EMEROTH STUDIO SRL (hereinafter referred to as "**Emeroth Development**").

Also, Emeroth Project is the developer of the mobile video game entitled Catacomb Crawlers with the goal to make the world's best and the first Blockchain Action RPG game with a roguelike gameplay mechanism, where millions of people can turn their passion for gaming into tangible assets and create a future where playing a game would give anyone the chance to earn an honest and steady income

On the way to achieving our goals, we are observing the confidentiality and security of the personal data, constantly ensuring that all personal data are processed only for specific, explicit and legal purposes, according with the principles and provisions of the GDPR.

- **Where can you find us and how you can contact us?**

With respect to any information regarding the personal data we process you can e-mail us at privacy@catacombcrawlers.com.

- **What personal data Emeroth Development may process about you, how your personal data are processed by Emeroth Development, the purpose, legal basis and the period of the processing**

Also, bear in mind that personal data is considered any data that could directly or indirectly identify you, as a person.

To easily identify the personal data we process, we have combined them into several categories according to the purpose of processing.

Emeroth Development processes the users' personal data, as follows:

CATEGORY 1 – SOCIAL MEDIA PLATFORMS

Personal data – related to each user, such as user's social media accounts; any other information users decide to provide us with when they contact us on the social media platforms; any other information users decide to provide us with when they contact us by e-mail; comments and/or posts on our profiles;

Given that the internet is not a safe space, please do not send us or limit, as much as possible, the personal data communicated through social platforms or e-mail.

The purpose of processing – the personal data mentioned above are processed for customer support purposes;

The legal Basis: Art. 6 para. 1 letter b) of the GDPR Regulation, which allows us to process personal data when necessary, for the performance of a contract or for the steps prior to its conclusion;

The collection method – personal data are collected directly from users when they decide to contact us;

The retention period: personal data are stored for the purpose of proving the fulfilment of contractual obligations between the parties for a period between 30 days and 1 year, depending on the nature of the request (complaint, request for the guarantee, contractual request, general request, etc.);

CATEGORY 2 – COMMUNICATION CHANNELS

Personal data – related to each user, such as phone number, online id, username, tags, etc;

Please do not send us or limit, as much as possible, the personal data communicated through online messenger apps (Telegram, Discord, WhatsApp, etc).

The purpose of processing – the personal data mentioned above are processed for customer support purposes;

The legal Basis: Art. 6 para. 1 letter b) of the GDPR Regulation, which allows us to process personal data when necessary, for the performance of a contract or for the steps prior to its conclusion;

The collection method – personal data are collected directly from users when they decide to contact us;

The retention period: personal data are stored for the purpose of proving the fulfilment of contractual obligations between the parties for a period between 30 days and 1 year, depending on the nature of the request (complaint, request for the guarantee, contractual request, general request, etc.);

Generally, personal data are kept for a limited period according to the purpose of the processing and the legal provisions applicable to each category of data.

Emeroth Development ensures the proper deletion of personal data when such processing is no longer necessary.

- **The disclosure of your personal to third parties**

Throughout its normal course of business, Emeroth Development will not disclose or transfer, for direct marketing purposes, your personal data to third parties, regardless if such parties are located in Romania, in the EU or outside the EU.

Our employees

Emeroth Development's employees that have access to personal data have been trained to observe the security and confidentiality of the personal data in performing the business activity. Emeroth Development's employees' access to personal data is limited to the information required in performing their specific tasks.

Suppliers

We perform our daily activities at the highest standards thus sometimes we choose to cooperate with other companies, in the EU or outside the EU, in order to facilitate several technical or administrative processes such as: e-mail hosting services, cloud services, server hosting, etc.

In case we decide to contract third parties for the supply of specific services, we will ensure that such third party complies with the provisions of GDPR and we will provide all information required for the proper performance of their services.

Legal requirements

Your personal data may be communicated to governmental authorities and/or law enforcement agencies if required by the applicable law.

- **Which are your rights and how can you effectively exercise them**

Emeroth Development as data controller, ensures technical and organizational measures to be sure that your rights (as a data subject) are observed:

Right of access

You have the right to obtain the confirmation as to whether or not personal data concerning you are being processed by us, and, where that is the case, access to your personal data and information on how they are processed.

Right to data portability

You have the right to receive some of your personal data, which you have provided to us, in a structured, commonly used and machine-readable format and you have also the right to transmit those data to another controller without hindrance from us, where technically feasible.

Right to object

You have the right to object to processing of your personal data, when processing is necessary for the performance of a task carried out in the public interest or for the purposes of the legitimate interests pursued by us. You have the right to object at any time if your personal data are being processed for direct marketing purposes.

Right to rectification

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you. The rectification shall be communicated to each recipient to whom the data was sent unless this proves impossible or involves disproportionate (demonstrable) efforts.

Right to erasure ('right to be forgotten')

You have the right to obtain from us the erasure of personal data concerning you without undue delay and we have the obligation to erase your personal data without undue delay where one of the following grounds applies: your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent on which the processing is based and there is no other legal ground for the processing; you object to the processing and there are no overriding legitimate grounds for the processing; your personal data have been unlawfully processed; your personal data have to be erased for compliance with a legal obligation; your personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

You have the right to obtain from us restriction of processing where one of the following applies: you contest the accuracy of your personal data, for a period enabling us to verify the accuracy of your personal data; the processing is unlawful and you oppose the erasure of your personal data and request the restriction of their use instead; we no longer need your personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims; you have objected to processing pending the verification whether the legitimate grounds of the controller override those of the data subject.

Right not to be subject to a decision based solely on automated processing

You have the right not to be subject to a decision solely based on automated processing, including profiling, which produces legal effects concerning the data subject or similarly affects the data subject in a significant manner. Therefore, we hereby state that Emeroth Development does not use applications, algorithms, artificial intelligence or automatic process to make automatic decisions (without human intervention) that produces legal effects.

To exercise your rights listed above you can send us your request (accompanied by your contact details) electronically to the e-mail address privacy@catacombcrawlers.com.

- **Children's personal data**

Emeroth Development does not collect any Personal Data from children under the age of 16.

So, if you are under 16, please do not submit to us any Personal Data.

- **What security precautions does Emeroth Development take to protect your personal data**

We have assumed the responsibility to implement proper technical and organizational measures regarding the protection of privacy and security of your personal data. We have taken all reasonable measures to protect your Personal Data from damage, loss, misuse, unauthorized access, alteration, destruction, or disclosure, as following:

- people who have access to our filing system are only those nominated by Emeroth Development. To access the system, they use individual accounts and passwords which are changed periodically.
- all our employees, collaborators and service providers who are in contact with personal data must act in accordance with the principles and policies regarding to the processing of personal data. They were informed and they have assumed to respect of the GDPR by signing the Data Processing Agreements or as an effect of the law.
- our employees and collaborators access personal data for the performance of their professional duties and only in accordance with the stated purpose of data collection.

- computers from which the filing system is accessed are password-protected and have antivirus, antispam and firewall security updates.
- personal data is printed only by authorized users, if it is necessary to perform our activity or to fulfil our legal obligations.

Please also select carefully what personal data do you choose to submit thinking that the internet or e-mails are not impenetrable spaces, and a technical error can cause an unhappy event anytime with respect to your personal data.

- **Links to other websites**

On our website, you may find links to other organizations. This Privacy Policy does not cover the personal data processed by them.

If you decide to access other organizations' links, we encourage you to carefully read their Privacy Policy which should be found on their websites. In general, the Privacy Policy may be accessed on the bottom section of the website.

- **Updates to the Privacy Policy**

In order to keep you informed, we always publish the latest version of the Privacy Policy on our website, without any specific notice in this respect.

We assure you that the way we collect and process your personal data is in accordance with the provisions of the GDPR Regulation.

We encourage you to constantly review this Privacy Policy in order to be constantly informed with respect to the categories, purposes and manners Emeroth Development processes your personal data.

If you have any questions about our Privacy Policy, please contact to us at: **priacy@catacomb crawlers.**

- **Information concerning Data Protection Supervisory Authority**

If you consider that your rights provided by Regulation no. 679/2016 have been violated, you can address directly to us or to our Data Protection Supervisory Authority: National Authority for the Supervision of the Processing of Personal Data (Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal) "ANSPDC" by submitting a complaint.

Contact details of the authority:

Link for compliances: https://www.dataprotection.ro/?page=Plangeri_pagina_principala

Contact link: <https://www.dataprotection.ro/?page=contact> HYPERLINK
["https://www.dataprotection.ro/?page=contact&lang=ro"](https://www.dataprotection.ro/?page=contact&lang=ro) HYPERLINK
["https://www.dataprotection.ro/?page=contact&lang=ro"](https://www.dataprotection.ro/?page=contact&lang=ro) lang=ro

Website: <https://www.dataprotection.ro/>

Address: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, cod postal 010336, Bucuresti, Romania