

# PRIVACY POLICY

Effective date: May 21, 2018

**GENERAL** Pachanko Labs ("us", "we", or "our") operates the <https://www.pachankostudio.com> website (the "Service") and your privacy is very important to us. This privacy policy is intended to give you confidence in the privacy and security of the personal information we obtain from you whether you are using Pachanko Labs products website, webshop, downloading our applications, or are merely visiting our website. However, please note that we are not responsible for any use of your personal information you provide to third-party applications or websites that may be accessed via the products or website. We recommend that you review the privacy policy of any third-party applications or websites that you use. 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.

**USE OF DATA** Pachanko Labs 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 unless you have opted not to receive such information.

**USE OF PERFORMANCE DATA** Pachanko Labs will use performance data, including performance statistics, bug fixes and other similar data ("performance data") uploaded to our website or acquired through our products. Pachanko Labs may use such performance data in any way, including, but not limited to, using, editing, altering, reproducing, publishing and/or distributing the performance data for any purpose, commercial or otherwise, provided that such performance data is stripped of all personally identifiable information.

**COLLECTION OF PERSONAL DATA** When you use our products or website, you may be asked for personally identifiable information such as your name, address, date of birth, email address & telephone number. By giving us such information, you will need to consent to our using it in the manner described in this policy. You may withdraw your consent at any time by emailing us at [contact@pachankostudio.com](mailto:contact@pachankostudio.com). Cookie information, pages you have requested

and your IP address may also be recorded by us and/or third-parties from your browser as set out in this policy.

**USE OF PERSONAL INFORMATION** We use personal information to allow us to process your service requests, provide access to privileged areas of the website, send out newsletters, personalize your visit to our website, personalize your use of our products, and enable us to improve the products and services we offer. We may occasionally carry out market research and send you details of services and offers that we think may be of interest to you. If you do not wish to receive such information, please unsubscribe by using the according links in the footer of our homepage and/or our webshop.

### **LEGAL BASIS FOR PROCESSING PERSONAL DATA UNDER GENERAL DATA**

**PROTECTION REGULATION** If you are from the European Economic Area (EEA), Pachanko Lab's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it. Pachanko Labs may process your Personal Data because: We need to perform a contract with you, you have given us permission to do so, the processing is in our legitimate interests and it's not overridden by your rights, for payment processing purposes or to comply with the law.

**RETENTION OF DATA** Pachanko Labs 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. Pachanko Labs 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 time 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 than those from your jurisdiction. If you are located outside La Réunion and choose to provide information to us, please note that we transfer the data, including Personal Data, to La Réunion and process it there. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer. Pachanko Labs will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an

organization or a country unless there are adequate controls in place including the security of your data and other personal information.

**DISCLOSURE OF PERSONAL INFORMATION** We may provide information about you to our employees and agents in order to administer any accounts, products and services provided to you by Pachanko Labs. We will not disclose your personal information to any third-party unless you have consented to such disclosure or where we are required to do so by law. Should you breach our terms and conditions or terms of use or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, we may disclose your information to a relevant authority. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

**DISCLOSURE FOR LAW ENFORCEMENT** Under certain circumstances, Pachanko Labs 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** Pachanko Labs 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 Pachanko Labs
- 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

**COOKIES** Cookies are small data files that a website you visit may save on your computer or handheld device that usually includes an anonymous unique identifier. Our website may use cookies for user authentication, keeping track of your preferences, promotional campaigns, tracking our audience size and traffic patterns, and in certain other cases. We may include small graphic images in our email messages and newsletters to determine whether the messages were opened and the links were viewed. Third-party advertisers may also create and access cookies, which will be subject to their privacy policies – we accept no responsibility or liability for the use of such third parties cookies. If you do not wish cookies to be placed on your PC or handheld device, then they can be disabled in your web browser. The option to do so is normally found in your browser’s “security settings” section. Please note that permanently disabling cookies in your browser may hinder your use of our website as well as other websites and interactive services.

## **DATA PROTECTION RIGHTS UNDER GENERAL DATA PROTECTION REGULATION**

**(GDPR)** If you are a resident of the European Economic Area (EEA), you have certain data protection rights. Pachanko Labs 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 what Personal Data we hold about you and if you want it to be removed from our systems, please contact us. In certain circumstances, you have the following data protection rights:

- The right to access, update or to 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 Pachanko Labs 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).

**ANALYTICS** We may use third-party Service Providers to monitor and analyze the use of our Service. 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 contextualize and personalize 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: <http://www.google.com/intl/en/policies/privacy/>.

**PAYMENTS** 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). 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 are: Stripe, their Privacy Policy can be viewed at <https://stripe.com/us/privacy> and PayPal or Braintree, their Privacy Policy can be viewed at <https://www.paypal.com/webapps/mpp/ua/privacy-full>.

**LINK TO OTHER SITES** Our Service may contain links to other sites that are not operated by us. If you click on 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.

**SECURITY** All security on our website is treated seriously. Where applicable, we undertake security steps, including use of SSL & TLS technology, on our front and back-end systems that store customer account information and to protect data transmissions. However, this is not a guarantee that such data transmissions cannot be accessed, altered or deleted due to firewall or other security software failures. If you have any further concerns about security, please email our customer service at [contact@pachankostudio.com](mailto:contact@pachankostudio.com).

**POLICY CHANGES** 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.

**CONTACT US** If you have any questions about this Privacy Policy, please feel free to contact us:

- by visiting this contact form: <https://www.pachankostudio.com/formulaire>