



# elysium.today's policy

## Cookie Policy

Last revised: 01/07/2020

### ABOUT THIS DOCUMENT

This is the Cookie Policy of RAV3, Inc. seated in Delaware, United States, (we will further call ourselves “RAV3” as RAV3, Inc. is the legal entity RAV3 is part of). We use technologies on our websites, games and mobile services (which we'll call the “RAV3 services”) to collect information that helps us improve your online experience. We refer to these technologies collectively as “cookies”. This policy explains the different types of cookies used by the RAV3 services and how you can control them. By using the RAV3 services and viewing the cookie notice that appears together with the RAV3 services, you agree that we can store and access cookies as described in this policy.

We hope that this policy helps you understand, and feel more confident about our use of cookies. If you have any further queries, please contact us at [hi@rav3.dev](mailto:hi@rav3.dev).

### WHAT IS A COOKIE?

Cookies are small text files that are stored on your computer or mobile device. They are widely used in order to make websites and other online services work or to be better or more efficient. They can do this because websites and other online services can read and write these files, enabling them to recognize you and remember important information that will make your use of them more convenient (e.g. by remembering your user preferences).

### WHAT COOKIES DO WE USE?

**Essential Cookies.** These cookies are essential to the operation of our service in order to enable you to move around it and to use its features. Without these cookies services you have asked for, such as accessing secure areas of a website or paid for content, cannot be provided. These cookies are essential for using the service and therefore cannot be turned off without severely affecting your use of it.

**Performance Cookies.** Performance cookies, which often include analytics cookies, collect information about your use of the RAV3 services and enable us to improve the way it works. For example, performance cookies show us what are the most frequently visited pages on our website, allow us to see the overall patterns of usage on the RAV3 services, help us record any difficulties you have with the RAV3 services and show us whether our advertising is effective or not. We also use cookies to help you navigate within our website and travel back to pages.

**Functionality Cookies.** In some circumstances, we may use functionality cookies. Functionality cookies allow us to remember the choices you make on the RAV3 services and to provide enhanced and more personalized features, such as customizing a certain webpage, remembering if we have asked you to participate in a promotion and for other services you request, like watching a video or commenting on a blog. All of these features help us to improve your visit to the RAV3 services.

## HOW DO THIRD PARTIES USE COOKIES ON THE SITE?

In some circumstances, we may work with third parties to provide services on the RAV3 services. For example, third-party analytics providers may use their own cookies to collect information about your activities on the RAV3 services and/or the advertisements you have clicked on. This information may be used by them to serve advertisements that they believe are most likely to be of interest to you based on content you have viewed. We do not control these cookies and to disable or reject third-party cookies, please refer to the relevant third party's website.

## HOW DO I CONTROL COOKIES?

You may stop accepting cookies from the RAV3 services at any time by activating the setting on your browser or mobile device, which allows you to stop accepting cookies or similar technologies. You may wish to refer to <http://www.allaboutcookies.org/manage-cookies> for information on commonly used browsers. Please be aware that if cookies are disabled, not all features of the RAV3 services may operate as intended.

## CHANGES TO THIS COOKIE POLICY

We may change this Cookie Policy at any time if necessary to reflect changes in the RAV3 services or the law: please take a look at the "LAST REVISED" date at the top of this page to see when this Cookie Policy was last updated. Any amendments to this Cookie Policy will become legally binding 30 days after we post it online.

## MORE ABOUT YOUR PRIVACY

Please also check out our privacy policy, which gives more information about how we protect your privacy: <https://elysium.today/legal/privacy-policy>.

# Privacy Policy

Last updated: 01/07/2020

### Overview:

1. This document explains what data is collected in connection with RAV3 games and services.
2. It also explains how we use that data, where we store it, and how we protect it.
3. In short:
  - in order for you to play our games or use our services we need to process some of your data. Should we need to process your data for any other purpose than offering you our games and services, we will

always ask you for your consent in advance.

- We will not share your data for third party advertising purposes.

4. Finally, it explains your rights in relation to your personal data.

This Privacy Policy is where we explain how your personal data is collected, stored or used, and what happens to it when you're using RAV3 games and services. You will need to agree to this Privacy Policy before you use a RAV3 game or service for the first time. If you have any questions you can contact us at [hi@rav3.dev](mailto:hi@rav3.dev).

## WHO WE ARE

We are RAV3, Inc., a company incorporated in United States which is the data controller under European Union data protection legislation. Hereafter, we will call ourselves “RAV3” as RAV3 is the team behind the video games within RAV3, Inc. You may contact us via email at [hi@rav3.dev](mailto:hi@rav3.dev).

## WHAT THIS PRIVACY POLICY GOVERNS

This Privacy Policy applies to: all our websites, games, forums, social media channels, customer and technical support and any other services we provide to you (Hereafter, the term "**RAV3 services**" will refer to all of these elements).

Specifically, this Privacy Policy governs personal data (or, as called in the United States, “personally identifiable information”) and non-personal data (or, as in the United States, “non-personally identifiable information”), which we collect from you when you're using RAV3 services. ("Personal data" basically means data, which, on its own or in combination with other data, can be used to identify you).

We respect your right to privacy and will only process personal data in accordance with applicable legislation in the EU and other countries where we offer our games and services.

## PROTECTING CHILDREN

We recognize we have a special obligation to protect personal data obtained from children. We do not and will not knowingly collect personal data from any child under 16 without consent from their parent or guardian. If you are a parent or guardian and are concerned about the transfer of personal data about your child, please contact [hi@rav3.dev](mailto:hi@rav3.dev).

## INFORMATION WE COLLECT

When you use RAV3 services, we may collect the following data if relevant (how we use it is described later in this document):

1. Your name and surname.
2. Your email address.
3. Any username (such as a forum username) used to identify yourself in any of our services.
4. Details of your digital platform account regarding our games (such as a Steam account, if you have one), but not any financial details.
5. IP address.
6. Technical details about any device which you use to access our services, including: Internet and/or network connection ; any mobile device identifier; your operating system, browser type or other software; or your hardware or other technical details. This is technical data about our users and their actions and patterns which does not provide personal data.
7. Details of your use of our services including, but not limited to: metrics data about when and how you use the services; traffic data; and your geographical location data.

8. Details about your use of social networking and our services (if you have linked our services to a social networking account). This may potentially include certain data from Facebook or other social networks (including access to your friends list as well as aggregated non-personal analytics data about our users) strictly in accordance with Facebook's and other networks' terms and conditions – in the extent necessary to provide you with all functions of RAV3 games and services.
9. Any other data which you supply us via our services.

In case you use our forums, we may additionally process data generated automatically through your activity in the forum: date of last activity, subscribed threads, favorite posts, achievements in the forum, private messages and posts.

We may also collect additional optional data via forum: contact data (messengers), website address, biography, location, interests, profession, avatar, user's preferred language.

If you contact our technical support (directly or using crash reporting functionalities in our games or services), we may process other data required to help you with any queries or support matters, such as data collected in crash logs that are gathered by your device or the technical parameters of the device you use to play.

For the purposes of events and competitions organized by RAV3, we may process additionally your correspondence address, phone number, social networks identifiers, image of yourself, bank account number.

We may also collect some non-personal data about our users (statistical information on usage of our games and services, information on devices used to connect to them) in order to better understand how our games and services are used and to improve them based on this knowledge.

In order to play our games and use our services, we need to process data provided above. In case you do not agree to provide us with the above-mentioned data, you will not be able to play our games or use other services.

Cookies. We and our partners also collect data about you via cookies. You can find out more about this in our Cookie Policy here: <https://elysium.today/legal/cookie-policy> . The Cookie Policy forms part of this Privacy Policy

## **HOW DATA ABOUT YOU IS COLLECTED**

We may collect and process data about you in the following ways:

- data you give us via RAV3 services;
- data given when you contact us or report a problem with RAV3 services;
- data about your activity as a user of our services (in addition to your IP address, country of origin, purchases, account of in-game virtual goods and currencies) - is collected automatically;
- we may also ask you to complete surveys that we use for research purposes. However, your response to surveys is not required. We may collect this data via RAV3 services or trusted partners connected with us for optional services such as surveys or polls.

A quick word about payment details (if/when you use them): We will not receive or store any of your payment details, this is fully handled by the relevant payment platform an/or payment method/processor.. If/when you make any purchases in RAV3 services, we are notified by the payment processor once the transaction takes place and then ensure you receive your purchase. We do not, however, receive any of your actual payment details. We only keep the data concerning transaction dates, currencies, value and the products of transaction.

## **WHY DO WE USE YOUR DATA (LEGAL BASIS FOR DATA PROCESSING)**

When we process personal data about you, we do so only as necessary to provide RAV3 the services you use (i.e. to perform the agreement between us), to meet our legal obligations or to fulfill the so-called “legitimate interests” of RAV3, or in accordance with the other cases described in the section “How is your data used?”.

To clarify, by legitimate interests we mean lawful purposes that could be reasonably expected (protecting the security of the data we process, marketing RAV3 games and services as well as ensuring our marketing is relevant for you, conducting anti-cheat analysis and anti-fraud checks). When we rely on the legitimate interest, we consider and balance any potential impact on you and your rights. For other purposes, we will ask for your

consent and you will be entitled to withdraw this consent at any time with no impact on the validity of the processing before your consent has been withdrawn.

When we transfer your data outside the European Economic Area, we do so on the basis of a variety of legal mechanisms, as described in “Trusted Partners”.

## HOW DO WE HANDLE YOUR PERSONAL INFORMATION

**Where do we store it?** The data we collect from you is stored on our secure servers in Europe or – only if necessary - by those of our Trusted Partners as described below. We implement appropriate technical and organizational measures to protect your personal data against unauthorized or unlawful processing, accidental loss, destruction or damage. We will take all reasonably necessary steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

**How long are we going to store your data?** We will retain your personal data only for as long as needed in order to fulfill the purposes outlined in this Privacy Policy. In certain special cases, a longer retention period might be required by law, such as for tax reasons, accounting purposes or other legal requirements and obligations. When we will no longer require your personal information in order to provide our game related services to you, we will either delete it or anonymize it:

- we will keep data that is associated with the services you use for the duration of the agreement to access the services (ex. RAV3 forum). Following account closure, limited data that we collect about you will still be retained for an additional few years for tax, legal or accounting purposes;
- if you contact us and don't use our services, we will retain correspondence with you as long as necessary to assist you , followed by a period necessary for legal or accountability purposes;
- for marketing purposes, we will store data as long as we have valid consent, without undue delay and no later than within 30 days from the moment we receive a request to unsubscribe.

## HOW IS YOUR INFORMATION USED?

Your data may be used for the following purposes:

- To carry out our obligations arising from any agreements between you and us.
- To provide you with marketing information (including personalized and targeted marketing emails), which we feel may interest you. For example, we may send you newsletters or emails about RAV3 services (of course, this is optional and we will ask you for permission first).
- To provide you with products or services that you request from us.
- To communicate with the users of our services
- To allow you to participate in interactive features of RAV3 services when you choose to do so.
- To notify you about changes to RAV3 services.
- To maintain, improve or modify RAV3 services.
- To conduct competitions organized by the RAV3 (including contact with participants, evaluation of applications, distribution of prizes, payment of tax on prizes).
- To calculate conversion rates and other elements of RAV3 services' performance.
- For tax, legal and accounting purposes.
- For the accountability purposes as defined by EU legislation (GDPR).
- To target and personalize our marketing communications, offers and advertisements that we display on our websites and services as well as those of third parties based on the combined data we have collected about you.

Whenever we're personalizing or targeting our marketing communications, offers and advertisements, we may profile your personal data, which means that we may use the data we collect to adjust the communication addressed to you to meet your needs. In such cases, we do not, however, use your personal data for profiling, which would constitute automated decision-making that could affect your legal situation (i.e. we do not use algorithms to make decisions which would have an impact on your individual legal rights or affect your legal

status or rights under the agreement between us. For example we do not make automatic offers based on your behaviour in the game) .

If you decide that you no longer want to receive personalized offers, product recommendations from us, or any advertising news at all, you can object to this service at any time.

We might process some aggregated and general non-personal data on user behavior (e.g. sales per region) with third party partners who work with us to provide RAV3 services to you (for example, with payment providers) in order to support, improve or amend RAV3 services. We may also share non-personal data with data analysis services to help us run RAV3 services.

## **DATA SHARING**

Please remember that any communications you have via RAV3 services (e.g. via private messages or RAV3 forums or via social media) may reveal details about you. Also, any data you post publicly using RAV3 services will be publicly available to RAV3 users and others. We are not responsible for your use of any private personal data which you choose to make available via RAV3 services, or the activities of other users or other third parties to whom you give or make available your data.

## **THIRD PARTY INFORMATION COLLECTION AND EXTERNAL SERVICES**

RAV3 services may, from time to time, contain links to and from the websites or services of third parties. Our Privacy Policy does not extend to these external sites or companies, so please refer directly to their privacy policies.

## **OUR TRUSTED PARTNERS**

We may share your data with the following Trusted Partners, who were engaged by us to help deliver our services and functionalities to you. Please rest assured that we always provide our partners with the minimum data necessary for them to achieve the purpose of their cooperation with us. They may have access to limited data about you and process it on our behalf for only the purposes set out below (they are formally called “Data Processors”):

- Our partners who provide us with internal management and data-sharing tools;
- Our partners who help us in data analysis by providing us with analytical tools;
- Our partners who help us manage our newsletters and email communications by providing us with email marketing tools;
- Our professional advisors who assist with legal, tax, audit or accounting matters;
- Advertising partners for the purpose of personalized and targeted marketing (for example, to inform via advertisements on websites you visit about our services you may enjoy).

When required by law, we may also share your data with the police or other government authorities (including your IP address and details of suspected unlawful or fraudulent activity such as unauthorized use of payment methods and security risk scores).

Your data may be processed, stored and transferred to countries outside your country of residence and beyond the European Economic Area (EEA), such as Switzerland or the United States. Privacy laws in these countries may not offer the same level of protection as in your country or in the EEA. But whenever we share your personal data outside the EEA, we will do so on the basis of EU standard contractual clauses or the Privacy Shield Framework, which are lawful measures to transfer your data and establish adequate protection of your personal data.

## **PUSH NOTIFICATIONS**

If you use our mobile apps then, with your prior approval, we may send push or local notifications to your mobile device to give you updates regarding those games. You can manage this, normally from your device’s Settings

section.

## OTHER STUFF

Please be aware that we are subject to various laws and may be required to release personal data to comply with law enforcement and other legal requirements.

In the unlikely event of a reorganization or merger of RAV3 we may transfer personal data to an involved third party who will protect to at least the same level as we do in this privacy policy.

## YOUR RIGHTS

You have the right to object to the processing of your personal data in certain situations and for marketing purposes at any time. You can do so by contacting us on the email address: [hi@rav3.dev](mailto:hi@rav3.dev).

You have the following additional rights:

- You have the right to access data held about you;
- You may contact us to request that we delete your personal data from our system;
- You may ask us to rectify/correct your personal data, if appropriate.
- You may ask us to restrict the processing of your data;
- You have the right to transfer your data to another entity;
- You have the right to file a complaint with a data protection authority.

You can exercise these rights by contacting us at [hi@rav3.dev](mailto:hi@rav3.dev)

In case of any concerns or questions about your privacy, please do contact us and we will do our best to assist you. You can reach us at: [hi@rav3.dev](mailto:hi@rav3.dev)

Under California law, California residents who have an established business relationship with us may choose to opt out of disclosure of personal information data about them to third parties for direct marketing purposes.

If you would like to exercise any of these rights or have any queries regarding them, contact: [hi@rav3.dev](mailto:hi@rav3.dev).

## CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy if we deem it necessary, such as for legal reasons or to reflect changes in our services. If we do so, we will make the altered Privacy Policy available online and update the “Last Updated” date.

Once we change the Privacy Policy, it will become legally binding on you 30 days after we post it online. During that period, you are welcome to contact us if you have specific questions about the changes.

Unfortunately, if you don't agree to those changes (regardless of whether you email us), we must ask you to cease using our RAV3 games and services. We're sorry we have to say that, but we hope you'll appreciate that we need to have everyone using it observing the same rules so our services can function properly. That's why we encourage you to get in contact if you have queries.

Not using right now:

## USER AGREEMENT

We would also like to remind you that our User Agreement has more data about how we operate RAV3 services and it has a number of sections, which apply to this Privacy Policy too. You can read it at <https://elysium.today/legal/user-agreement>.

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