

# Kiloo Privacy Policy and Cookie Policy

Last updated: October 16, 2020

Hello! This Privacy Policy explains how your personal data are processed by Kiloo A/S ("Kiloo") when you are using our customer support, social media channels, questionnaires, competitions or employment opportunities (collectively referred to as our "Services").

Furthermore, the Cookie Policy explains what cookies are and how we use them on our website, [www.kiloogames.com](http://www.kiloogames.com).

Please notice that this Privacy Policy and Cookie Policy only applies to the above-mentioned Services. For Kiloo's processing of your personal data in our games, please review the applicable privacy policy which can be found at [www.kiloogames.com](http://www.kiloogames.com).

We reserve the right to change this Privacy Policy and Cookie Policy at any time. If we make changes, we will notify you by revising the date at the top of the policy and re-post the policy in the "Privacy" section of our website. Depending on the specific changes, we will provide you with additional notice or require a renewed consent.

Please review this Privacy Policy and Cookie Policy from time to time in order to stay informed about how we process your personal data and use cookies.

## Contact us

Kiloo has the following contact information:

Kiloo A/S

Address: Bülowsgade 68, 8000 Aarhus C, Denmark

E-mail: [support@kiloo.com](mailto:support@kiloo.com)

For Employment opportunities: E-mail: [jobs@kiloo.com](mailto:jobs@kiloo.com)

You can always contact Kiloo if you have questions about the processing of your personal data, the cookie policy, or if you have any requests in regard to your rights under the General Data Protection Regulation ("GDPR"). We encourage you to primarily contact us through Customer Support ([support@kiloo.com](mailto:support@kiloo.com)), where you will get the fastest response.

# Privacy Policy

## Our processing of personal data

Kiloo takes processing of your personal data very seriously. We ensure a reasonable and transparent processing in accordance with the rules on processing of personal data.

For the purpose of clarity, we have separated the description of our processing activities into different categories:

- **Employment opportunities**
- **Customer Support**
- **Social Media and Questionnaires**
- **Competitions**
- **Information from cookies**

## Employment opportunities

When you apply for a job at Kiloo or request notifications regarding new jobs, Kiloo will process your personal data (submitted by you). You are obligated to provide personal data which are accurate, complete and up to date at the time of submitting the data.

The personal data you choose to provide will be processed by Kiloo in accordance with the GDPR. It is stored in a secure environment and only used in compliance with this policy.

### *The type of processed data*

Kiloo will process your personal data in the form of general information such as contact information, education and common information in your application/resume.

We request that you do not provide sensitive information (racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation), data relating to criminal convictions and offences or personal identification numbers. Such data will be deleted from our database as soon as possible.

### *The purpose and legal basis for the processing*

Kiloo will process your personal data for the following purposes:

- Recruitment for open vacancies
- Recruitment on the basis of unsolicited applications
- Notifications about new jobs (jobs newsletter)

Our processing of personal data for the purposes described above are necessary for the recruitment of employees, see Article 6 (1)(b) of the GDPR concerning necessary processing for the purpose of entering into an agreement with the data subject. It is also necessary for our legitimate interests in filling vacant positions with qualified applicants, see Article 6(1)(f) of the GDPR (also known as "the balancing-of-interest rule").

We will always request your explicit consent in accordance with the GDPR if we require sensitive information, such as data relating to criminal convictions and offences, or personal identification numbers in order to process your application.

#### *Recipients of the personal data*

We will not disclose your personal data to third parties with the exceptions of the companies described below.

Your information will be transferred to our data processor, Kilo Ventures A/S, which handles all employment activities.

If you sign up for the jobs newsletter, our service provider, MailChimp, with whom Kilo has a written Data Processor Agreement, will have access to your information. MailChimp is based in the USA and in compliance with Privacy Shield.

#### *Transfer to third countries*

Our data processor may transfer your personal data to the US, which is considered an insecure third country. The basis of the transfer is a Privacy Shield certificate, which can be seen here:

<https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG>

#### *Storage of personal data*

In relation to recruitment your data will be stored for a maximum of 6 months. If you do not want your personal data to be stored for these 6 months, you can contact Kilo at [jobs@kilo.com](mailto:jobs@kilo.com) at any time and request your personal data to be deleted.

If you have signed up for the job newsletter your data will be stored for as long as it is relevant or until you unsubscribe. You can unsubscribe by clicking the link in the newsletters you received, or you can send an email to [jobs@kilo.com](mailto:jobs@kilo.com).

Please see below for information regarding your rights under the GDPR.

## Customer Support

Kilo collects information you voluntarily submit when using our Customer Support.

#### *The type of processed data, the purpose and legal basis for the processing*

When engaging with our Customer Support, we may ask you to provide general personal information voluntarily in order to respond to your inquiry. This information may include your name, email address, contact details, payment related information), device ID and the nature of your request or communication.

We request that you do not provide sensitive information (racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation), data relating to criminal convictions and offences or personal identification numbers. Such data will immediately be deleted.

We collect this information in order to better assist you with any issues you might encounter with our products.

*Our processing for the above purposes is necessary for the performance of a contract to which you are party in order to facilitate the delivery of requested products and services by providing Customer Support, see Article 6(1)(b) of the GDPR.*

#### *Recipients of the personal data*

We will not disclose your personal data to third parties, but we may use data processors who process personal data on our behalf.

#### *Storage of personal data*

We only store your information for up to 6 months after which we will delete or anonymize it.

## Social Media and Questionnaires

Kiloo collects information you voluntarily submit when using our social media channels (e.g. sending fan mails with user generated content, posting comments or user generated content on our social media channels) or when answering our questionnaires.

#### *The type of processed data, the purpose and legal basis for the processing*

Kiloo only process personal data that you provide.

You may provide certain general information to Kiloo such as your name, email address, contact details, your answers to the questionnaire and the nature of your communication.

We request that you do not provide sensitive information (racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning health or data concerning a person's sex life or sexual orientation), data relating to criminal convictions and offences or personal identification numbers. Such data will immediately be deleted.

We collect this information in order to administer the social media channels and communicate with you, as well as learn more about your gaming preferences so we can constantly improve our services to you.

Our processing for the above purposes is justified by our legitimate interests in administering the social media channels, communicating with you and improving our services in accordance with Article 6(1)(f) of the GDPR (also known as "the balancing-of-interest rule").

#### *Recipients of the personal data*

We will only disclose your personal data to third parties in the form of the social media channels, but we may use data processors who process personal data on our behalf.

Please be advised that pursuant to recent case law from the European Court of Justice, it is the interpretation of the Danish Data Protection Agency that Facebook and an administrator of a fan page on Facebook are acting as joint controllers in the meaning of Article 26 of the GDPR for the processing of personal data on the Facebook fan page. See [Facebook's data policy](#) for more information on Facebook's processing of data on Killoo's Facebook page, including the recipients of such data and possible transfer to third countries.

#### *Storage of personal data*

We only store your information for as long as it is relevant and Questionnaires up to 6 months after which we will delete or anonymize it.

Please see below for information regarding your rights under the GDPR.

## Competitions

#### *The type of processed data, the purpose and legal basis for the processing*

When you enter into our competitions, we collect the general information you provide such as contact details, your answers or your submission of content e.g. a video or an image. If you win one of our competitions, we may collect further information from you such as your address or electronic forms of contact.

If we are supplying prizes to a competition held by a third-party such as the owner of a social media account, your contact details may also be disclosed to us from the third-party in question in order for us to provide the prize to you.

The collection of personal data is necessary for your participation in the competition as we may otherwise not be able to enter you into the competition or provide the prize.

The purpose of the processing is to administer the competition and deliver the prize(s). We may also use your personal information to conduct research and plan and develop our product and marketing strategies.

Our processing for the above purposes is necessary for the performance of a contract to which you are party in order to facilitate the competition and deliver the prizes, see Article 6(1)(b) of the General Data Protection Regulation. Furthermore, it is justified by our legitimate interests in improving our services in accordance with Article 6(1)(f) of the General Data Protection Regulation (also known as "the balancing-of-interest rule").

#### *Recipients of the personal data*

We only disclose your personal data to third parties in the form of mail delivery services to deliver the prizes, but we may use data processors who process personal data on our behalf.

#### *Storage of personal data*

We only store your information as long as it is relevant after which we will delete or anonymize it as we believe this period is sufficient for making sure that our competitions are completed in a timely manner.

Please see below for information regarding your rights under the GDPR.

## Information from cookies

### *The type of processed data, the purpose and legal basis for the processing*

Through cookies on [www.kiloogames.com](http://www.kiloogames.com) we log general information about your use of the website. This includes the type of browser you use, access times, subpages viewed on our website, your IP address, and the page you visited before navigating to [www.kiloogames.com](http://www.kiloogames.com).

The purpose of the processing is to improve our services. Thus, the processing *is justified by our legitimate interests in improving our services in accordance with Article 6(1)(f) of the General Data Protection Regulation (also known as "the balancing-of-interest rule")*.

### *Recipients of the personal data*

Through 3rd party cookies belonging to social networks and Google Analytics, information is transferred to Facebook, Twitter, Youtube, Vimeo, and LinkedIn. The purpose is to guide the webpage visitor to social networks that have more information and videos regarding Kiloo. These companies are based in the USA and in compliance with Privacy Shield.

### *Storage of personal data*

We only store your information for 14 months after which we will delete it. We believe this period provides the most relevant use to us.

Please see below for information regarding your rights under the GDPR and our Cookie Policy, including ways to delete and avoid cookies.

## Your rights

When you reach out to Kiloo you can expect to hear back from us within one month from the time we received your request. However, in some cases we need more time to answer due to the complexity of the request. In such cases our response time can be up to three months in total. This prolonged response time follows the criteria of Article 12 of the GDPR.

### **Right to request access**

You have the right to request access into the personal data we store on you. This right is granted to you as a pursuant to Article 15 of the GDPR. The right includes – amongst other things - access to information about:

- the purposes for the data we collect and use
- the kind of data we collect and use
- the employees within Kiloo and eventual 3rd party services whom the data is disclosed to
- how long time we intent to store the data.

In addition to the above, you have the right to obtain a copy of the personal data we process on you. Please note that in some cases your access to this copy may be restricted due to intellectual property or trade secrets.

### **The right to object**

You have the right to object to the processing of your personal data. The right to object is based on the so called “balancing-of interest rule” in Section 6(1)(f) of the GDPR. Please see Article 21 of the GDPR for further information on this rule. When we receive your objection, we will immediately processing your personal data unless we have compelling and legitimate grounds for using your personal data which override your interests, rights and freedoms, or if the processing is necessary for the establishment, exercise or defense of legal claims.

You also have the right to object to our processing for direct marketing purposes. You can make use of this right at any time, in which case we will stop processing for the purpose you object to.

### **Right to correction and erasure**

You have the right to have inaccurate personal data corrected. Please see Article 16 of the GDPR for more information.

You also have the right to have your personal data erased when your request is based on one of the following grounds:

- the personal data is no longer necessary in relation to the purpose for which it was originally collected or otherwise processed;
- if our processing of your personal data in question is based on your consent, and you have withdrawn such consent and there are no other legal reasons for us to keep processing the data in question;
- if you have objected to our processing of your data and there are no overriding legitimate grounds for our processing;
- the data must be erased to comply with a legal obligation in Union or Member State law;
- the data has been processed in an unlawful manner; or
- the data has been processed in relation to the offer of information society services; and consent is given or authorized by the holder of parental responsibility over a child.

Please note that your right to have your personal data erased may be limited if the data is a) necessary for us to comply with a legal obligation or b) necessary for the establishment, exercise or defense of legal claims.

### **The right to restriction**

Under certain circumstances, you have the right to obtain restriction of our processing of your personal data. For more information, see Article 18 of the GDPR. If you have right to restriction, we will only process your data

with your consent or for the establishment, exercise or defense of a legal claim or to protect a person or important ground of public interest.

### **The right to withdraw consent**

If we have asked for your consent to process your data, you have the right to withdraw this consent at any time. Please see Article 7 of the GDPR for more information.

When you withdraw your consent, we will stop storing and using the data to which you have withdrawn your consent, unless we have a legal obligation to keep some or parts of the data.

If you withdraw your consent, the withdrawal only affects present and future use of your data. It does not affect the lawfulness of the processing based on your content before its withdrawal.

### **The right to data portability**

You have the right to receive the personal data you have provided us in a structured, commonly used and machine-readable format and to transfer this data on to another company or service if our processing is based on consent or contract performance. For more information, please see Article 20 of the GDPR.

## **Complaint**

If you wish to make a complaint over the processing of your personal data, you have the right to lodge a complaint to the relevant supervisory authority.

## **Cookie Policy**

Like many websites, we use cookies on [www.kiloogames.com](http://www.kiloogames.com) to collect information.

A cookie is a small data file that is transferred to your device's hard disk e.g. for the purpose of recognizing it, remembering settings and making statistics. Cookies are designed not to be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

We use cookies to log information about your use of the website to facilitate and optimize the use of the website and for traffic measurement. This includes the type of browser you use, access times, subpages viewed on our website, your IP address, and the page you visited before navigating to [www.kiloogames.com](http://www.kiloogames.com).

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies. Please read the Privacy Policy above for more information on how we handle personal information about you.

We only store cookies for 14 months after which we will delete them.



## Which cookies are used?

We use first party cookies from the website itself in order to facilitate and optimize the use of the website and for traffic measurement. These cookies are persistent cookies.

We also use third party cookies belonging to Google Analytics and social networks in the form of Facebook, Twitter, Youtube, Google+, Vimeo and LinkedIn. The purpose is to guide the webpage visitor to social networks that have more information and videos regarding Kiloo. These companies are based in the USA and in compliance with Privacy Shield.

## How to delete and avoid cookies

You can always choose to opt-out of cookie or disable them entirely on your device via plugins or from your browser settings. Alternatively, you can set your device to alert you when cookies are being sent to your device; however, disabling cookies may affect your ability to use our Services.

Guidance on how to delete cookies on [Microsoft Internet Explorer](#)

Guidance on how to delete cookies on [Mozilla Firefox](#)

Guidance on how to delete cookies on [Google Chrome](#)

Guidance on how to delete cookies on [Opera](#)

Guidance on how to delete cookies on [Safari](#)

Guidance on how to delete [flash cookies \(all browsers\)](#)

It is also possible to deactivate cookie through a consent tool such as <http://www.youronlinechoices.com/uk/your-ad-choices> (serviced by EDAA).