



PLINK

Privacy Notice

Last updated: April 24, 2024

This notice describes how PLINK collects and processes personal data via the Plink mobile application, its desktop version, and <https://plink.gg/> website (collectively the “**Platform**”). We are committed to safeguarding the privacy of our users. The terms “we”, “us”, “our” refer to PLINK INC.

Controller details: Plink Inc.

Registered address: **848 N Rainbow Blvd #5340, Las Vegas, NV 89107**

Contact email address: support@plink.tech

Data Protection Officer:

Contact email address: dpo.plink@legalnodes.com

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What information do we collect?

Creation of your account and public profile

To register your account, we collect the following information:

- your **email address, telephone number** (and **country of residence** based on it), and **nickname**;
- synchronization with your account on one of the gaming platforms, such as Steam, PlayStation, Xbox, Blizzard, Epic Games, Wargaming, Warface, uPlay, GOG Galaxy, League of Legends, Twitch or mobile apps (Clash of Clans etc.). You can connect your social networks to the account;

The information we will receive from those platforms includes: your nickname, profile picture, list of games that you played, your **gaming activity information and statistics** in them, your **friend list**.

For the registration, it is required to synchronize with only one of the platforms. However, you may synchronize with any other platform from the list above on your own choice;

You may provide additional information to fill in your public profile, such as **motto** (short description), **gender** and **birthday** information, languages speaking, your country flag, personalized profile link, hashtag and **profile picture and background**. This information, along with your gaming activity will be available on your public profile for other users.

Your profile will also show how many people subscribed to your profile to receive updates (feed) from you, how many games you are playing, and how many people you subscribed to.

User feed

Users are able to publish, review, react (e.g., like), and comment posts in the Platform feed. To enable this feature, we collect information about your interests (to personalize the feed), your posts (text, photos, videos), views, reactions, comments, and the information about the users that you subscribed to.

We use the collected information to enable the work of the feed feature, personalize your feed in accordance with your activity, and match you with other users. In the course of matchmaking, your data is also used to improve the matchmaking algorithm.

Chats and other forms of user interactions

Users have various ways of interacting with each other on the Platform, such as direct and group messages, voice chats, exchange of gifts, and streams. To ensure that this feature works, we process dates and the time of messages, information about recipients, and content you share with other users, depending on the type of interactions.

The information about your connections and groups that you participate in is used for matchmaking with other users, including for improving the algorithm.

Gaming statistics

Our Platform allows you to see and publish your statistics in the various games you are playing. The information analyzed by the Platform includes time played each synchronized game and gaming platforms, in-game stats (specific performance indicators, etc.), friends whom you played the games with, and platforms with which you have synchronized.

PRO feature and payment processing

You are able to choose the type of subscription you would like to have on the Platform (pro/regular). To choose the paid subscription, you will have to proceed with the payment through



a third-party processing system.

Please note that we do not receive your payment details from them, but only payment confirmations and details of the transactions you perform.

Log sessions, website and app analytics

We collect information about your user experience on the Platform – your **device information, IP address, time and duration of use**. This information is being used to help you with managing your sessions, protect your rights and fix issues about your account.

We also collect anonymized and aggregated details of your visits to the Platform including, but not limited to traffic data, location data, length visit, other communication data, IP address, device information (such as your hardware model, operating system version, unique device identifiers). Besides, a desktop version of the Platform monitors the list of processes running on your personal computer to learn about the launch of synchronized games. It is non-personally identifiable information.

The desktop version of the Platform uses a microphone and an audio output for voice chats, but we collect no data using the microphone.

Contacting us by email regarding partnerships, technical support, and job application

Using the email and other information provided on the website, you will be able to send us an inquiry or your information for the job opening. We will process this information, including your email address and content of the email, to answer your inquiry or, where appropriate, consider your job application.

We will also use information from tech support inquiries to fix and improve the Platform, and analyze our efficiency in marketing and product efforts, including by creating statistics of inquiries.

Cookies

A cookie is a small text file that is stored on a user's computer for record-keeping purposes.

Cookies help uniquely identify your browser software over time on our Platform. We use cookies to make it easier for you to navigate the website. Cookies also enable us to track and target the interests of users to enhance the experience on the website.

To learn more about how we use cookies, please visit our [Cookie Notice](#).

Our Platform embeds Google Fonts, a web font service that offers API to deliver font files. When you visit our Platform, your browser sends HTTP requests (including IP address) to the Google Fonts Web API which logs details of such HTTP requests (requested URL, user agent, and referrer). The logged data is used for debugging purposes, generating aggregate usage statistics, etc. For more information, please visit Google Fonts Privacy FAQ: <https://developers.google.com/fonts/faq/privacy>.



Purposes and legal bases of processing (GDPR Art. 6)

1. Performance of the contract (Art. 6.1b)

We use the performance of the contract as a legal basis for the following processing activities:

- To create and maintain your user account and public profile;
- To allow you to connect and interact with other users and provide other social network features;
- To allow you to review and manage your gaming statistics;
- to communicate you about significant announcements about the Platform or any user account you may create;
- to process payments that you do for the use of the Platform.

Without this information we will be unable to provide you with the Platform functionality.

2. Consent (Art. 6.1b)

We collect your consent as a legal basis for the following processing activities:

- to provide you with a smart matchmaking feature based on the information from your profile, location, languages speaking, platforms synchronized, and activity on the Platform;
- cookie or similar forms of tracking for marketing and analytics purposes;
- to provide you with email and in-app newsletters and announcements, and to contact you about other products and service offers from us;

You can withdraw your consent at any time. You can usually do it on the Profile page. The withdrawal of consent will not affect the lawfulness of processing based on consent before.

Please note, that for publishing other people's personal data in your feed or otherwise on the Platform you should obtain their consent or another applicable legal basis in accordance with GDPR Art. 6.

As an administrator of the group on the Platform, you become a joint controller of personal data of its members with us. We remain fully responsible for the processing of personal data to maintain a group and other Platform features. You are responsible for the processing of personal data of the group members to the extent of your activities within this group.

3. Legitimate interests (Art. 6.1f)

We do the following processing activities in our legitimate interests:

- Improving the matchmaking algorithm based on user data;
- Analyzing our Platform traffic and our marketing efficiency;
- to improve your experience by personalizing the Platform.
- To allow you to manage your log session and prevent fraud activities;
- to improve the Platform's usability;
- to comply with the laws of non-EEA countries that apply to our activities, in particular those of the country where we are registered in, such as tax or accounting laws.

4. Compliance with EU laws (Art. 6.1c)

In certain cases, we may be subject to local EU laws that may require us to disclose or otherwise process personal data of the users. Should this be the case, the applicable legal basis will be our compliance with legal requirements.



Access to personal data by third parties

Analytics

Non-Personally Identifiable Information may be collected and processed either by Google Analytics, Firebase Analytics, MyTracker, Amplitude, Apptimize, UserX Analytics and Appsflyer services. Metrics are used in an anonymized way to improve the Platform's usability and for marketing purposes. Non-Personally Identifiable Information is not a subject of regulation of this privacy notice.

We use ironSource advertising platform which is subject to its Privacy Policy <https://www.ironsrc.com/wp-content/uploads/2019/03/ironSource-Privacy-Policy.pdf> and Terms of Use <https://www.ironsrc.com/wp-content/uploads/2019/03/ironSource-Terms-of-Use.pdf>.

We use YouTube API services to show videos on the Platform. This platform also allows us to receive analytics of how our Platform is used by the users, in particular what videos and for how long they are watching. **By using the Plink App or the Website, you are agreeing to be bound by YouTube Terms of Service at <https://www.youtube.com/t/terms>.** To learn more about YouTube's data collection practices, please see YouTube Terms of Service located at <https://www.youtube.com/t/terms>, Google Terms of Service located at <https://policies.google.com/terms> and Google Privacy Policy located at <https://policies.google.com/privacy>. In addition to our normal procedure for deleting stored data provided in this privacy notice, the users can revoke our access to their data via the Google security settings page available at <https://security.google.com/settings/security/permissions>.

Cloud hosting

Your personal information is being stored and processed on Amazon and Digital Ocean. These servers have all technical measures that comply with GDPR requirements. Those cloud hosting providers are data processors on our behalf.

SMS Authentication

For certain users that registered before removing the SMS authentication feature, we use third-party services to send SMS to users. These services are used for authentication purposes only. We do not send SMS marketing to the collected phone numbers.

Payment processing

To receive payments from users, we use services of third-party payment processors. Payment processors are independent controllers over your payment information which includes your payment card data. We do not control nor instruct them on how to process payments information, but only receive payment confirmation from them.

To learn more about how those third-party payment processors process your payment details, please visit their websites or contact them directly.

Content sharing

If you have a registered OTG Companion account, your personal information, including your account and public profile data, posts, clips, messages, multimedia, and your other content, will be shared with POSEIDON 133 PTE. LTD for business purposes. This information will be mirrored on POSEIDON 133 PTE. LTD's respective website(s), app(s), and/or other platforms (if applicable).

To learn more about how POSEIDON 133 PTE. LTD processes your personal information, please



read its Privacy Notice.

Other disclosures

In addition to the disclosures for the purposes identified elsewhere in this privacy notice, we may disclose information about you:

- if we are required to do so by law;
- in connection with any legal proceedings;
- to establish, exercise or defend our legal rights (including providing information for the purposes of fraud prevention); and
- to the purchaser or seller of any business or asset which we are selling or purchasing.

Except as provided in this privacy notice, we will not sell, share or rent your information to third parties.

Third-party services

Our Platform contains links to third-party services and platforms. We are not responsible for the content, terms and conditions or privacy policies of third-party websites.

We encourage users to be aware when they leave our Platform and to read the privacy statements of the websites that collect personally identifiable information.

Third-party websites may contain their own cookies. We are not responsible for their usage of cookies.

Retaining your personal information

We will store your personal information till it is necessary to carry out our obligations to you regarding the Platform. We will not store your information if you delete your account or if we do not use it anymore for the purposes listed in this privacy notice. If you become inactive, we will delete your account and data 2 years after your last log session.

We may be subject to statutory laws that require us to retain data about payments we received from the users. To comply with such requirements, we will retain relevant information for the period of statutory obligations.



Your Rights

You may exercise certain rights regarding your personal data. In particular, you have the right to:

- **The right to object against the processing of your information.**
If we process your information for our legitimate interests (e.g., for direct marketing emails or for our marketing research purposes), you can object to it. Let us know what you object against and we will consider your request. If there are no compelling interests for us to refuse to perform your request, we will stop the processing for such purposes. If we believe our compelling interests outweigh your right to privacy, we will clarify this to you.
- **The right to access your information.**
You have the right to know what personal data we process. As such you can obtain the disclosure of the data involved in the processing and you can obtain a copy of the information undergoing processing.
- **The right to verify your information and seek its rectification.**
If you find that we process inaccurate or out-of-date information, you can verify the accuracy of your information and/or ask for it to be updated or corrected;
- **Restrict the processing of your information.**
When you contest the accuracy of your information, believe we process it unlawfully or want to object against the processing, you have the right to temporarily stop the processing of your information to check if the processing was consistent. In this case, we will stop processing your data (other than storing it) until we are able to provide you with evidence of its lawful processing;
- **The right to have your personal data deleted.**
If we are not under the obligation to keep the data for legal compliance and your data is not needed in the scope of an active contract or claim, we will remove your information upon your request.
- **The right to have your personal data transferred to another organization.**
Where we process your personal data on the legal basis of consent you provided us or on the necessity to perform a contract, we can make, at your request, your data available to you or to an organization of your choosing.

You can complete requests by contacting us at support@plink.tech.

If you believe that our use of your Personal Information violates your rights, you can lodge a complaint with your national data protection authority.

Security of your personal information

We take necessary and sufficient organizational measures to protect your information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

The third-party tools and our team members are located in different countries, including those that are outside of the European Economic Area. When transferring personal data to third countries, we will ensure that appropriate safeguards for such transfers, such as Standard Contractual Clauses, are in place. To learn more, please contact us via the contact email.

Immediate access to the personal information is allowed only to our authorized employees involved in maintaining the Platform. Such employees keep strict confidentiality and prevent unauthorized third-party access to personal information.



Changes to this notice

We may update this privacy notice from time-to-time by posting a new version on our Platform. We advise you to check this page occasionally to ensure you are happy with any changes. However, we will endeavor to provide you with the announcement about any significant changes.