Privacy policy

1. Preamble

The privacy policy was last updated on Saturday, April 1, 2023.

1.1. Definitions

The following definitions will help you understand the document:

- "The services", "Arkedya": all services provided by the publisher.
- "The publisher", "The Arkedya team", "We": the natural or legal person that publishes the services.
- "The user", "The player", "You": the natural person using the publisher's services.

1.2 Introduction

This privacy policy is intended to comply on an ongoing basis with the recommendations of the <u>CNIL</u> and the requirements of the <u>GDPR</u> of April 27, 2016. Applying to all online services offered by the publisher, it will help the user understand what data are subject to collection, how they are collected, what happens to them once they are retrieved, and why the publisher collects them.

2. Data

2.1. Controller

The publisher is the controller of personal data and attaches great importance to the protection of its users' data in order to establish a climate of trust between them and the publisher. The privacy policy may therefore be amended and supplemented at any time, in particular to comply with new legislation as it comes into force. It can be contacted via the contact form and its contact details are available in the legal notices.

2.2. Collection

User data may be collected in the two ways described below:

- 1. Completely automatically during browsing, with no action required on the part of the user.
- 2. Through information provided by the user in forms.

The publisher is keen to stress that all data are retrieved securely, and that sensitive data are encrypted before storage.

2.3. Nature

In the course of using the services, the publisher may collect the following types of data:

- Language.
- Time zone.
- IP address.
- Browser type.
- Operating system.

- Viewed page.
- Internet address of referring website.
- Date and time of activity.
- Frequency and duration of use.

The publisher wishes to emphasise that it does not collect or store any banking data.

2.4. Processing

The user data collected by the publisher will be used for the following purposes:

- To improve the user experience on the services by offering personalised, internationalised and accessible interfaces.
- To optimise, secure and alleviate the computer system and servers so that the user can fully enjoy the reliability of the services.
- To compile statistics for information purposes and to influence future decisions.
- To moderate inappropriate content and disputed accounts that do not comply with the <u>terms and</u> conditions, carrying out analyses that are as anonymous and transparent as possible.

The publisher respects the confidentiality of its users and undertakes not to:

- Track the user for advertising purposes using the data collected.
- Resell the information to third-party websites and companies.
- Use the data to harm the user.

2.5. Retention

Data are stored in accordance with recommendations and legal requirements, and in particular for the following periods:

- Personal data related to visitors, users, prospects and customers who do not respond to any solicitation, or from the date of definitive suspension: up to **3 years**.
- Personal data related to human resources: 5 years.
- Concluded contracts and billing data: 10 years.

2.6. User rights

In accordance with legal requirements, the user may at any time make a request to the publisher for the access, rectification or erasure of his personal data. From the date of receipt of a request, the publisher has a legal response period ranging from **1 month** for a simple request to **3 months** for a complex request.

2.6.1. Right of access

The user has the right to ask the publisher for further information on the use or current status of his personal data.

2.6.2. Right to rectification

The user has the right to rectify his personal data: those subject to change can be changed, on his own initiative, via the interfaces provided online.

2.6.3. Right to erasure

With regard to the right to erasure, also known as the right to be forgotten, the user has an online interface allowing him to erase all his personal and service access data. A prior notice before the erasure, which the duration must comply with the aforementioned legal requirements, may be set up by the publisher, and during which the user may cancel the procedure.

3. Cookies

Cookies are small text files stored in alphanumeric format on the user's terminal. They are used to record data that the user may or may not have previously selected on a website. As they are not compilable, they can neither perform any actions, nor browse or analyse a terminal in search of private information.

The user can disable cookies in his browser settings. However, some modules, such as the login one, may not work normally. The user is therefore fully responsible for the settings he chooses.

3.1. Storage

Cookies are placed on the user's terminal by the publisher. The following types of cookies may be stored on the user's terminal:

- **Necessary cookies**: these cookies are required to enable the basic functionalities of the services. Without them, the services cannot work properly.
- **Preference cookies**: these cookies store users' choices on the services. Therefore, they make it possible to provide improved and more personal functionalities.
- Analytic cookies: these cookies help the publisher to better understand how its services work. For example, they may be used to measure audience and usage. The publisher may thus obtain anonymous statistics on the number of visitors to its services, in order to optimise ergonomics, navigation and content.
- Marketing cookies: these cookies are used to track users online. The aim of these cookies is to deliver advertisements that are more relevant and interesting to different users. However, they may also be used to limit the number of times an advertisement is displayed and to measure the effectiveness of advertising campaigns. They are therefore persistent cookies that almost always come from third-party companies.

Nevertheless, the publisher undertakes not to place marketing cookies on the user's terminal.

3.2. Lifetime

The cookies placed by the publisher are stored for a period that depends on the type of cookie and the requested service:

- **Session cookies**: these are cookies that are stored temporarily. They are automatically erased when the user closes his browser and stops browsing.
- **Persistent cookies**: these cookies remain in one of the browser's directories even after it has been closed. The user can erase them manually, otherwise the browser will erase them automatically once the lifetime specified in each cookie file has expired.

In order to comply with legal requirements, the publisher limits the maximum storage period for persistent cookies to **13 months** after they are first placed on the user's terminal, as well as the period of validity of the user's consent regarding the use of these cookies. Furthermore, the lifetime of cookies is not extended with each visit. In this way, the user's consent is renewed at the end of this period, or when he decides to change it via an online interface.

4. Third-party service providers

The publisher uses third-party service providers in connection with the use of its services. This means:

- that the publisher may transfer some of the user's personal data to these third-party service providers, particularly internationally,
- that these third-party service providers may collect, store and process the user's personal data,
- and that these third-party service providers may place cookies, especially marketing cookies, on the user's terminal.

Third-party service providers

Name	Purpose	Data processing location	Company location
Google reCAPTCHA	CAPTCHA tests for security purposes	United States	United States
PayPal	Payment system	United States	United States
Discord	Instant messaging platform for the community	United States	United States
Twitter	Social network to share service news	United States	United States