



# Privacy Policy

Valid for 10 Chambers Collective KB, Reg. No. 969778-3935 and

After Impact AB, reg. No. 559047-9977

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## Content

<b>1. General</b>	<b>2</b>
<b>2. Privacy Policy Responsibility</b>	<b>2</b>
<b>3. When do we collect and process your personal data?</b>	<b>2</b>
<b>4. What personal information do we process?</b>	<b>3</b>
<b>5. Why do we process information about you?</b>	<b>3</b>
<b>6. Legal basis for 10 Chambers Collectives processing of your personal data</b>	<b>4</b>
<b>7. Profiling</b>	<b>4</b>
<b>8. How long do we keep information about you?</b>	<b>5</b>
<b>9. Who do we share your personal information with?</b>	<b>5</b>
<b>10. Changes in 10 Chambers Collectives privacy policy</b>	<b>7</b>
<b>11. Your rights</b>	<b>7</b>
<b>12. Cookies</b>	<b>8</b>
<b>13. Policy for handling e-mail addresses</b>	<b>9</b>
<b>14. Contact information for 10 Chambers Collective</b>	<b>10</b>

## 1. General

This privacy policy describes how 10 Chambers Collective KB, reg. No. 969778-3935 and its subsidiary After Impact AB, reg. No. 559047-9977, Vattugatan 15, 111 52 Stockholm, e-mail: [privacy@10chambers.com](mailto:privacy@10chambers.com), (collectively called "10 Chambers Collective", "we") collect, use, disclose and store your personal data.

**1.1** This Privacy Policy applies when you subscribe to our newsletter (the Ambassador Program), visit any of our websites ([www.gtfothegame.com](http://www.gtfothegame.com) and [www.10chambers.com](http://www.10chambers.com)), play a game by 10 Chambers Collective and make any other contact with 10 Chambers Collective.

**1.2** You will always be able to feel safe when you provide your personal information to us. Our purpose with this Privacy Policy is to show you how we ensure that your personal information is treated in accordance with applicable data protection legislation. Our aim is to collect a minimum amount of personal data. We never collect any personal data which is unnecessary.

## 2. Privacy Policy Responsibility

10 Chambers Collective KB and After Impact AB are joint controllers for the processing of your personal data. We are responsible for the processing under applicable legislation. 10 Chambers Collective KB is however your main contact and you are welcome to contact us by the contact details below in section 14 if you have any complain or concerns.

## 3. When do we collect and process your personal data?

**3.1** We collect information when you visit our websites or when you sign up for our newsletter and when you open our newsletters.

**3.3** The information we collect about you is described in section 4 below.

**3.4** The personal data is stored in our CRM (Mailchimp) and chosen system for web analytics (Google Analytics).

**3.5** We collect information you play our games (Steam, PlayFab and Unity Analytics).

**3.6** We collect information when you report bugs bugs and crashes (Jira and Unity Analytics).

**3.7** We collect information when you access our homepage and webshop (Loot Land and PayPal).

## 4. What personal information do we process?

### 4.1 If you are an Ambassador of 10 Chambers Collective (subscribes to our newsletter)

10 Chambers Collective collect and process the following personal information about you as a newsletter subscriber:

- E-mail
- The date you started your subscription
- Which of our e-mails you open
- What links you click on in the e-mails

### 4.2 If you visit our websites

10 Chambers Collective collect and process your IP address and your use of 10 Chambers Collectives websites. For information on how we collect information from cookies, please see section 12 about our usage of cookies. The information we collect for visitors of our site are:

- Which pages you visit
- Time spent on each page
- What links you click on
- Which site referred you to the current site
- What type of browser you are using

### 4.3 If you play our games

10 Chambers Collective collect and process event data when you play our games.

- Gameplay and device information from players who play our games
- The user-level personal data collected is Steam ID, device ID and IP address
- Hardware specs, usage data, in-app purchase behavior, and custom event data

## 5. Why do we process information about you?

We only use your personal information for the original purpose it was collected for. If we should wish to use your personal data for any other purpose, we will first ask for your prior consent.

### 5.1 If you are an Ambassador (subscriber of our newsletter) of 10 Chambers Collective

10 Chambers Collective process your personal data in order to:

- Communicate with you (e-mail).
- Track your interactions (opens and clicks) with our newsletter to analyze and improve our newsletters content.
- Troubleshoot and optimize if we experience problems with our newsletter.

### 5.2 If you visit our websites

10 Chambers Collective process your personal data in order to:

- Analyze how you navigate on our websites and to make changes in order to improve the experience and to make the website more user-friendly.
- Analyze which parts of our websites visitors finds most interesting.
- Troubleshoot and optimize if we experience problems with our websites.

### **5.3 If you play our games**

10 Chambers Collective process your personal data in order to:

- Analyze how you play the games and your gaming environment in order to improve your gaming experience.

## **6. Legal basis for 10 Chambers Collectives processing of your personal data**

We base the processing of your personal data on a number of legal bases as described below.

**6.1** Consent: We process the information collected through cookies and e-mail address based on your consent as a legal basis. When you register for our newsletter (Ambassador) you will be asked to consent to our processing of the submitted personal data for the purpose of sending the newsletter to you. For cookies we collect consent through a pop-up banner that informs you about our use of cookies.

**6.2** Legitimate interests: In order to be able to send offers to you about our products and events, and to make limited market segmentation of customers, e.g. based on your location, we use legitimate interest. We only use this basis when our legitimate interest is not overridden by the interest of your fundamental rights and freedoms. Only a minor part of our processing of personal data is based on legitimate interest. 10 Chambers Collective do not treat special categories of personal data on the basis of legitimate interest.

**6.3** Compliance with a legal obligation: In some cases, 10 Chambers Collective will have a legal obligation to process your personal information. This applies for example to the processing of personal data that we perform under [the Swedish accounting legislation](#).

## **7. Profiling**

**7.1** 10 Chambers Collective may process your personal data for profiling. If you visit our websites or subscribe to our newsletter, we may analyze information in order to create a personal profile for you. We base the profiling on the following information:

- how you use 10 Chambers Collectives websites,
- which of our products and offers that you have been interested in,
- which newsletters you interacted with,
- data on interactions with our newsletters

The purposes of the profiling are to provide personalized offers that we believe suits you and to send you direct marketing about games/products we think you would like.

**7.2** You may at any time object to the processing of personal data described above. You may also, at any time, withdraw your consent towards receiving direct marketing as described above. You may do this by contacting us at [privacy@10chambers.com](mailto:privacy@10chambers.com) or by sending your request to 10 Chambers Collective, Vattugatan 15, 111 52 Stockholm. Once we receive your notification, we will without undue delay cease processing your personal data for this purpose and not send you any further direct marketing.

## 8. How long do we keep information about you?

**8.1** Personal data are only stored as long as necessary in order to fulfill the purposes for which the personal data were collected in accordance with this Privacy Policy. 10 Chambers Collective may store personal data for a longer period of time if this is necessary in order to comply with legal requirements.

**8.2** Your personal information is stored in our CRM and data analysis tools as long as we have an active relationship with you, meaning that you have interacted or shown interest in 10 Chambers Collective during the last ten years or, if you have signed up for information regarding a specific game release, until the game is released and we have contacted you regarding this. We will always delete your personal data if you revoke your consent for the processing and in some cases if you raise objections against the processing, see section 11.

## 9. Who do we share your personal information with?

### 9.1 Third parties

If necessary, 10 Chambers Collective may disclose information to third parties, such as 10 Chambers Collectives chosen systems for CRM, data analytics and web hosting. If the third party process personal data on the behalf of 10 Chambers Collective, we will enter into processing agreements with these parties under which the processor is only entitled to process personal data according to the terms of the agreement and our specific instructions.

10 Chambers Collective does not sell personal data to any third party.

The third parties 10 Chambers Collective provide information to may only use the information to:

- sell and market 10 Chambers Collective's products
- to deliver services related to 10 Chambers Collective's agreement with the client

These third parties are:

- our chosen system for web analytics (Google Analytics)
  - For more information about Google Analytics' privacy policy, which may be updated from time to time, please visit: <https://www.google.com/analytics/terms/us.html>
- our chosen CRM system (Mailchimp)
  - For more information about Mailchimp's privacy policy, which may be updated from time to time, please visit: <https://mailchimp.com/legal/privacy/>
- our web hosting (One.com)
  - For more information about One.com's privacy policy, which may be updated from time to time, please visit: <https://www.one.com/en/info/privacy-policy>
- our game backend platform (PlayFab)
  - Information: Data and Network. For more information about PlayFab's privacy policy, which may be updated from time to time, please visit: <https://playfab.com/terms/>
- our game engine (Unity)
  - For more information about Unity's privacy policy, which may be updated from time to time, please visit <https://unity3d.com/legal/privacy-policy>.
- our bug reporting tool Jira (Atlassian)
  - For more information about Atlassian's privacy policy, which may be updated from time to time, please visit: <https://www.atlassian.com/legal/privacy-policy>
- our webshop partner (Loot Land)
  - For more information about Loot Land's privacy policy, which may be updated from time to time, please visit: <https://shop.gtfothegame.com/content/6-personal-data>
- our payment provider for the webshop (PayPal)
  - For more information about PayPal's privacy policy, which may be updated from time to time, please visit: <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>
- our game distribution platform Steam (Valve)
  - For more information about Valve's privacy policy, which may be updated from time to time, please visit: [https://store.steampowered.com/privacy\\_agreement/](https://store.steampowered.com/privacy_agreement/)

## **9.2 In order to comply with applicable legislation or regulatory requirements**

We may also disclose personal data if necessary for 10 Chambers Collectives legal interests or the detection, prevention or attention of fraud and other security or technical issues.

## **9.3 Transfer outside the EU / EEA**

10 Chambers Collective may transmit data to countries outside the EU / EEA-area, if any of 10 Chambers Collectives service providers are based there. If data are transferred outside the EU / EEA, 10 Chambers Collective will fulfill all

measures necessary to ensure that data are protected and fulfill all measures necessary for a lawful transfer in accordance with applicable legislation.

## 10. Changes in 10 Chambers Collectives privacy policy

10 Chambers Collective reserves the rights to at any time change and update this Privacy policy. We will then make the new version available on our websites. We may also contact you in an appropriate manner if we make any material changes to the Privacy Policy. If the changes require your consent, we will ask you for this before any changes take effect.

## 11. Your rights

**11.1** 10 Chambers Collective is responsible for the processing of your personal data in accordance with applicable legislation.

**11.2** 10 Chambers Collective may at your request or on own initiative correct, de-identify, erase or supplement personal information that is inaccurate, incomplete or misleading.

### **11.3 You are entitled to the following rights:**

- You are entitled to obtain a transcript of the personal data held about you free of charge, information about the purpose of the treatment and to which receivers the data has or will be shared. You also have the right to information on where the information has been received and information on profiling. If you request additional transcripts, we may charge an administrative fee.
- You have the right to ask for correction of your personal information. We will then correct any incorrect information.
- You may request deletion of your personal information if your personal data no longer are necessary for the purpose for which it was collected, and if we are not required to keep it due to legal obligations. If this is the case, we will erase all your personal data without undue delay.
- Data portability. You have the right to, under certain circumstances, request to receive your personal data and have it transmitted in a structured, widely used and machine readable format to another data controller.
- You have the right to object to personal data processing carried out with the support of legitimate interest. 10 Chambers Collective will only continue the treatment if our legitimate interest overrides your interests.

**11.6** If you do not want 10 Chambers Collective to process your information for e-mail marketing, you have the right to at any time object to the processing by sending an e-mail to [privacy@10chambers.com](mailto:privacy@10chambers.com). Once we have received your objection, we will cease to process your personal data for such marketing purposes and will no longer contact you with any direct marketing.

**11.7** You have the right to revoke your consent to the processing of personal data at any time, with immediate effect.

You may exercise all your rights described above in this section 11 by contacting [privacy@10chambers.com](mailto:privacy@10chambers.com). Since we are obligated to verify your identity, we may ask you for further identification details or request that you send in a written, undersigned request.

## 12. Cookies

### 12.1 What are cookies?

A cookie is a small text file that the website saves on your device or computer in order to e.g. recognize you the next time you visit the site. The cookies are used to improve the web experience for visitors. The information may e.g. be used to track a user's surfing.

There are two types of cookies:

- **persistent cookies** saves a file on your device for you to be able to use the website and access different functions.
- **Session cookies** are used only during your stay on the website in order to facilitate navigation on the server. These cookies disappear when you stop using our website and shut down your web browser.

For more information about cookies, [www.whatarecookies.com](http://www.whatarecookies.com).

### 12.2 This is how we use cookies on our websites

**12.2.1** Our websites uses persistent cookies and session cookies in order to:

- Measure and analyze visitor's navigation of the sites to learn what visitors appreciate and show an interest in.
- Allow the system to recognize returning users to make the experience as good as possible.
- Remember a visitor's choice of text size on the site and various form fields to facilitate the use of the websites.

**12.2.2** If you accept session cookies, you will be able to use our website in full.

**12.2.3** If you do not accept cookies, you will not be able to use our website in full.

### 12.3 Analysis of websites

We use Google Analytics for information on how visitors use the websites. The following cookies are created when you visit the Web:

Permanent cookies:



- `__utma`, distinguishes between users and sessions / visits. It is updated with each page view and expires two years after it is inserted or last updated.
- `__utmz`, measures the traffic sources and site navigation (such as the search engine that was used to find our websites). It expires six months after it is inserted or last updated.

Session cookies:

- `__utmb`, calculates the new sessions / visits. It is updated with each page view and expires 30 minutes after it is inserted or last updated.
- `__utmc`, used with "`__utmb`" to calculate when a new visit is made on site (30 minutes of inactivity counts as a new visit). It expires when the browser shuts down.
- `__utmt`, calculates site speed and maturing 10 minutes after it is added.

Cookie	Description	Expires
<code>_ga</code>	use of GA in distinguishing other	two years
<code>_gid</code>	use of GA in distinguishing visitors	24 hours
<code>_gat</code>	use of GA to limit the frequency of the number of requests	1 minute

Information that is created by these cookies is used in order to calculate data for the improvement of content, navigation and web structure. [Learn about Google's privacy policy here.](#)

#### 12.4 Remove the storage of cookies

If you do not want cookies stored on your computer, you can turn it off in your browser settings. No cookies will be stored, but note that your personal settings will be erased. Learn [how to delete cookies from your browser here.](#)

If you do not want your visit to our website to appear in Google Analytics, you can use an extension to your browser. See the [Google Analytics Opt-out Browser Add-on.](#)

### 13. Policy for handling e-mail addresses

We handle your e-mail address according to this Privacy Policy.

- Your e-mail address will not be sold, leased or otherwise made available for use to another company that is not included in the same company group as 10 Chambers Collective KB, After Impact AB or its subsidiaries.
- All e-mails are sent with technology that will not make your e-mail address visible to other subscribers.

- When subscribing to our newsletters, you agree that your personal data (e-mail address) must be stored and used in 10 Chambers Collective current system for e-mail marketing (Mailchimp).
- Information submitted to 10 Chambers Collective (e-mail address) may be used for targeted online advertising, if you used the opt-in for this when you started your subscription.
- All of our e-mails include a link where you can unsubscribe from any further newsletters. If you use this option, your personal data will be deleted from the system for e-mail marketing (Mailchimp) and we will stop processing this data for marketing purposes.
- Your consent is valid until you unsubscribe, withdraw your consent by contacting 10 Chambers Collective via e-mail on [privacy@10chambers.com](mailto:privacy@10chambers.com).

## 14. Contact information for 10 Chambers Collective

You may contact us if you have any questions about this Privacy Policy, the processing of your personal data or to exercise any of your rights as described in section 11. Our contact information can be found below.

10 Chambers Collective / After Impact AB

E-mail: [privacy@10chambers.com](mailto:privacy@10chambers.com)

Address: Vattugatan 15, 111 52 Stockholm, Sweden