

TMGCL PRIVACY POLICY

This privacy policy applies to the use of cZeus website available at: <https://www.czeuspuzzles.com> and to the use of cZeus Maths Challenger app (hereinafter referred to as “cZeus app”) and all related technical services developed or provided by The Mathematical Games Company Limited, a company registered in England and Wales under company number 8093051, whose registered address is at 1-7 Park Road, Caterham, Surrey, CR3 5TB United Kingdom (hereinafter referred to as “TMGCL”).

1. DEFINITIONS

- 1.1. GDPR is Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), published in the Official Journal of the European Union, L 119 on May 4, 2016.
- 1.2. Data Protection Legislation means UK Data Protection Act 2018 (of May 23, 2018) or any other applicable law by which GDPR provisions are implemented.
- 1.3. Personal data means any information relating to an identified or identifiable natural person.
- 1.4. Identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.5. Data subject is any identified or identifiable natural person whose personal data is being collected, held or processed.
- 1.6. Data controller is TMGCL, which is processing personal data only for the purposes and in the scope stated and described in this Privacy Policy.
- 1.7. Data processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- 1.8. User or Users means any individual(s) who use(s) cZeus website or any of the services provided by TMGCL through cZeus website or who use(s) cZeus app and all services provided by TMGCL in relation to such app.

2. DATA COLLECTION AND DATA PROCESSING

- 2.1. TMGCL collects and processes data (including certain personal data) upon users' explicit consent given to TMGCL after reading this Privacy Policy; and data which TMGCL is required to collect and process by applicable law or by regulators or if such processing is necessary in order to comply with its contractual obligations or to pursue TMGCL's legitimate interests.
- 2.2. TMGCL collects and processes data (including certain personal data) solely for the purpose of:
 - enabling the operation of cZeus website and performance of cZeus app,
 - ensuring the full functionality of all modules and features of cZeus app and all technical services related to it; and

- complying with its general legal and contractual obligations.
- 2.3. TMGCL may use data collected for statistical analysis and in order to further develop and improve cZeus website and cZeus app and related technical services or to communicate with users and provide troubleshoot or other important information to users.
- 2.4. TMGCL makes competition results data analysis in order to provide users a comparison to each other and to give them incentive to improve.
- 2.5. The types of data TMGCL collects depends on the method of login: a) as a Guest User, b) as an Email Login User c) as a Facebook Login User:
For all Users (a, b and c users defined above) TMGCL collects:
 - nickname or customised name and user language,
 - IP address, device ID, web browser type-version and other device information,
 - information about the operating system and version,
 - statistical analysis data and competition results; crash reports and defects,
 - game attempts, progression, results, session game time start-end-duration;For Email Login User, TMGCL additionally collects:
 - name and email address;For Facebook Login User, TMGCL additionally collects:
 - name, surname, email address, gender, age range and birthday,
 - profile picture and user's friends list,
 - preferred currency and locale identifier,
 - data users disclose on social media platforms (when you log in through social media platforms).
- 2.6. TMGCL collects data from users when they register with TMGCL through cZeus app or cZeus website, when they contact TMGCL with an enquiry or other feedback, when they participate in interactivity (for example when users submit an entry to a competition or prize draw) and when they request to be sent communications such as updates or newsletters.
- 2.7. TMGCL may collect data from third parties or social media platforms (such as Facebook) and use such data under the terms and conditions set by third parties or social media platforms.
- 2.8. TMGCL shall store data only for as long as it is required to fulfil the relevant purposes described in this Privacy Policy or until users withdraw their consent in accordance with this Privacy Policy or as long as may be permitted by the applicable law (for example to comply with legal, accounting, tax or other reporting requirements).

3. DATA PROTECTION MEASURES

- 3.1. Using a commercially reasonable level of skill and care and taking into account the nature, scope, context and purposes of processing personal data, TMGCL shall implement appropriate technical and organisational measures to ensure a level of security which is in conformity with the generally accepted industry standards and is in compliance with GDPR and Data Protection Legislation to which TMGCL is subject.
- 3.2. TMGCL shall ensure protection of users' personal data by providing:
 - i. physical security of all offices, storage rooms, system servers and other facilities used for providing cZeus website, cZeus app and technical services related to them (including appropriate alarm system, video supervision, fire alarm system and similar backstop mechanisms);
 - ii. prevent unauthorised access by a system of passwords, system logs and firewalls,
 - iii. secure redundant data storage system;
 - iv. application of data daily backup copies for 7 days, weekly backup for 4 weeks, monthly backup for 12 months and yearly backups for 10 years;
 - v. system level data backup and

- vi. remote (dislocated) weekly backup.
- 3.3. TMGCL shall ensure that persons authorised by TMGCL to process users' personal data have committed themselves to confidentiality or are under an appropriate statutory or contractual obligation of confidentiality.
- 3.4. TMGCL may engage one or more subcontractors who will carry out specific processing activities on behalf of TMGCL. However TMGCL is obliged to impose upon such subcontractors the same level of data protection obligations as set out in this Privacy Policy, in particular providing them to implement appropriate technical and organisational measures that will meet the requirements of GDPR and Data Protection Legislation.
- 3.5. In the event TMGCL detects a personal data breach within the system where cZeus apps or webpage or technical services related to cZeus app are operating or stored, TMGCL shall without undue delay notify the breach to users and to the competent supervisory authority, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

4. DATA SHARING AND DATA TRANSFERS

- 4.1. TMGCL is not in the business of selling its users' personal information to others. TMGCL may only share users' personal information as described in this Privacy Policy, and in accordance with GDPR or other Data Protection Legislation.
- 4.2. TMGCL may share users data with companies that provide certain information processing services to TMGCL (like hosting facilities or other technology services) and in such cases TMGCL shall require such companies to take appropriate security measures to provide the same level of data protection as set by this Privacy Policy and shall allow them to process personal data only for specified purposes and in accordance to TMGCL instructions and shall prohibit any subsequent transfers of data to others or to a third country or international organisation without authorisation of TMGCL or another competent authority.
- 4.3. TMGCL shall not transfer any personal data outside EU, except in cases appropriate safeguards are provided or when third parties participate in EU-US Privacy Shield framework or are operating under European Commission approved data transfer agreements.

5. USERS' CONSENT

- 5.1. By confirming and agreeing to this Privacy Policy and by using cZeus website and/or cZeus app users authorise TMGCL to store and process their data solely for the purposes and in the scope stated in this Privacy Policy.
- 5.2. In relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 13 years old. Where the child is below the age of 13 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.
- 5.3. Users have the right to withdraw their consent at any time. In order to do so users must follow the procedure described in Section 8 of this Privacy Policy.

6. THIRD PARTY WEBSITES AND SERVICES

- 6.1. TMGCL may provide links to websites of other organisations including links to social media platforms (such as Facebook) or digital content distribution websites (such as

Google Play or App Store). TMGCL has no control over such websites or platforms and does not access, collect or store any data users provide to those websites or platforms.

- 6.2. This privacy notice does not cover how other organisations process users' personal data, therefore users are advised to read the privacy notices on the other organisations' websites or platforms they visit or use.

7. COOKIES AND WEB ANALYTIC TOOLS

- 7.1. TMGCL uses cookies to enable certain functions for cZeus website in particular enabling it to recognise a user and respond appropriately. Cookies are small text files which are stored and saved on user's computer or other device and are used in order to make cZeus website work, or work more efficiently, and to provide certain information to TMGCL. If you refuse cookies certain functions of cZeus website may be restricted. Cookies are not used for personal identification and do not retrieve any other information from user's computer, pass on viruses or capture user's e-mail address.
- 7.2. This is the list of cookies TMGCL uses on cZeus website:

Category	Name	Intention	Time limitation	Disable cookies
Session cookie		identification of registered users	individual session	
1 st party cookie	-gat -gid -ga	website analytics by TMGCL	1 min 24 hours 2 years	https://czeuspuzzles.com/disablecookies.html

- 7.3. If users do not accept cookies, they should revoke their acceptance on the links above.
- 7.4. TMGCL relies on Google Analytics by Google Inc. to analyse cZeus website use. Users can block cookies for Google Analytics by installing the opt-out plugin from: <https://tools.google.com/dlpage/gaoptout>

8. USERS DATA PROTECTION RIGHTS

- 8.1. Users have the right to ask for copies of their personal data collected and operated by TMGCL.
- 8.2. Users have the right to rectify or complete personal data that is inaccurate or incomplete and to demand erasure of personal data.
- 8.3. Users have the right to restrict the processing of their personal data and to object processing.
- 8.4. Users have the right to ask TMGCL to transfer any personal data collected by TMGCL to users or to a third party chosen by users.
- 8.5. To exercise any of the rights above or to withdraw users' consent or make any requests related to personal data operation or processing users should contact TMGCL at: support@tmgcl.com.
- 8.6. Information and any communication or any actions taken under this section shall be provided by TMGCL free of charge. However in cases where a request is manifestly unfounded or excessive, in particular because of its repetitive character, TMGCL may charge users reasonable administrative costs necessary for providing the information or communication or taking the action requested.

- 8.7. TMGCL shall provide information on action taken on a request to users without undue delay and in any event within one month of receipt of the request. However that period may be extended by two further months where necessary, taking into account the complexity and number of the requests.
- 8.8. TMGCL shall inform the user of any such extension within one month of receipt of the request, together with the reasons for the delay.
- 8.9. If TMGCL does not respond within the above time frame, or if users wish to complain against TMGCL decision related to their request, users should contact the Information Commissioner Office (ICO) to the following address: Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire, SK9 5AF, U.K. or email to: casework@ico.org.uk (more information on how to contact ICO or make a data protection complaint are available at: <http://www.ico.org.uk>).

9. UPDATES AND AMENDMENTS

- 9.1. TMGCL may revise this Privacy Policy from time to time and the most current version will always be posted on the cZeus website.
- 9.2. Users are responsible for checking such posts regularly.
- 9.3. By continuing to access or use the cZeus website or cZeus app after revisions become effective, users agree to be bound by the revised Privacy Policy.

10. GOVERNING LAW AND JURISDICTION

- 10.1. This Privacy Policy shall be governed by and interpreted in accordance with the laws of England and Wales.
- 10.2. If any disputes arise between TMGCL and users, the parties agree to first try to negotiate in good faith and settle the dispute. If it is impossible to arrive at a mutually satisfactory solution within a reasonable time, the parties agree to submit the disputes to the courts of England.

Last modified: June 28, 2018

Contact: support@tmgcl.com