

## **Broken Rules Website & Newsletter Privacy Notice**

This website is operated by Broken Rules Interactive Media GmbH, Museumsplatz 1, Stiege 1, Top 2 Q 21, 1070 Vienna (“**Broken Rules**”). This notice provides you with information on how we, as the data controller, process your personal data in connection with our website.

### **1. What kind of your data we process**

In the course of your visit of this website and the processing of your information in regards with our newsletter we will collect the categories of personal data set out below:

#### Website users:

In the course of your visit on our website, the following categories of your personal data will be collected:

- the date and time a page was viewed on our website
- your IP address
- name and version of your web browser
- the web page (URL) that you visited before accessing our website

#### Newsletter receiver:

- contact data (e.g. email address)
- name
- in which of our games you are interested in

You are under no obligation to provide Broken Rules with the data we ask you for. However, if you do not provide your personal data, you will not be able to make use of the website or to receive any news regarding our newest games. Should the provision of your personal data be mandatory by law, we will inform you separately thereof.

### **2. Cookies**

Cookies are small text files that may be installed on your computer when you visit a website. Cookies are generally used to provide site visitors with additional functionality within the site. Cookies cannot access, read or modify any other data on your computer.

Our website does not use any kind of Cookies.

### **3. Purposes of processing your data**

We will process your personal data set out above for

- a. provision of our website including all associated services;
- b. further improvement and development of our website;
- c. detecting, preventing, and investigating attacks on our website; and
- d. transfer of information about Broken Rules newest activities and developments.

#### 4. **Legal bases of the processing**

We process the categories of your personal data listed above on the following legal bases under the General Data Protection Regulation (“**GDPR**”):

- We process the categories of personal data set out under point 1 “Newsletter receiver” exclusively on the basis of your consent according to Article 6(1)(a) GDPR.
- We process the categories of personal data set out under point 1 “Website users” on the basis of our overriding legitimate interest according to Article 6(1)(f) GDPR to achieve the purposes in point 3 a to c.

#### 5. **Transfer of your personal data**

To achieve the purposes set out above, we will transfer your personal data to the following categories of recipients:

- IT service providers that we use;
- Mailchimp
  - o [Unsubscribe from Newsletter here](#)
  - o [Unsubscribe from Job Positions here](#)
  - o [Unsubscribe from Presslist here](#)

To send out our newsletter, we use "MailChimp", a service of Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA. With the help of MailChimp we can analyze our newsletter campaigns.

When opening an e-mail sent with MailChimp, a connection is established with the MailChimp servers. This allows us to determine whether a newsletter message has been opened and which links have been clicked on, if any.

In addition, technical information such as the time of retrieval, the IP address, browser type and operating system of the recipient are registered. This information is used exclusively for the statistical analysis of our newsletter. The purpose of these analyses is to better adapt future newsletters to the interests of the recipients.

The legal basis for data transfers to the USA is the EU standard contractual clauses agreed with MailChimp in connection with our examination of the admissibility of these data transfers in the sense of a comprehensive risk assessment. We have concluded a data processing agreement in the meaning of Art. 28 GDPR with MailChimp (<https://mailchimp.com/legal/data-processing-addendum/>).

Further information on the legality of MailChimp's data transfers to the USA and the special security measures taken for this purpose can be found at: <https://mailchimp.com/help/Mailchimp-european-data-transfers/>. General data protection information of MailChimp can be found at: <https://mailchimp.com/legal/privacy/>.

#### 6. **Retention period**

Broken Rules will retain your personal data

- until you withdraw your consent to receive our newsletter;
- which our website collects automatically in the course of your visit for a period of two months; or

- Broken Rules will only retain your data for a longer period (i) to the extent that this is necessary to investigate attacks on our website, or (ii) as long as required under statutory retention obligations, or (iii) as long as potential legal claims are not yet time-barred, where personal data is needed to raise or defend against the claim.

## **7. Your rights in connection with your personal data**

Under applicable law, you have the right to (under the conditions set out in applicable law):

- obtain confirmation as to whether and what kind of personal data we store about you and to request copies of such data;
- request rectification or erasure of your personal data;
- request us to restrict the processing of your personal data;
- object to the processing of your personal data;
- withdraw any consent previously granted for the processing of your personal data (withdrawing your consent does not affect the lawfulness of processing based on your consent before your withdrawal);
- request data portability; and
- lodge a complaint with the competent supervisory authority.

## **8. Our contact details**

Please address your requests or questions concerning the processing of your personal data to:

Broken Rules Interactive Media GmbH  
Museumsplatz 1, Stiege 1, Top 2 Q 21  
1070 Vienna  
E-Mail: [yourdata@brokenrul.es](mailto:yourdata@brokenrul.es)

Last updated on *02.05.2023*