

## Privacy and Personal Data Protection Policy.

In this privacy policy we inform the users of Grid-Iron how we manage personal data.

Grid-Iron website (hereinafter “game”) is a web based game, intended for fun and friendly competition between its users.

Grid-Iron game is managed by Melderion d.o.o., Urbanova ulica 6, 1310 Ribnica, Slovenia.

This policy is prepared in accordance with provisions of Regulation (EU) 2016/697 on protection of individuals with regard to the processing of personal data and on the flow of such data (hereinafter General Regulation on Data Protection or GDPR) and the legislation of Republic of Slovenia (in particular the Personal Data Protection Act – ZVOP-1).

### Personal data manager

Melderion d.o.o., Urbanova ulica 6, 1310 Ribnica, Slovenia manages the personal data.

Persons, to whom the data refers to, and other interested personage, can contact the company by e-mail, sent to an address created specifically for such actions, [privacy@melderion.com](mailto:privacy@melderion.com)

### Personal data

Personal data is information that identifies a person as a specific and identifiable individual.

An individual is identifiable when it's possible to determine his identity directly or indirectly by means of an identifier such as a name, identification number, location data, web identifier, or with stating one or more factoids that are specific to individuals physical, physiological, genetic, mental, economic, cultural and or social identity.

Melderion d.o.o. collects and stores the following personal data, dependent on circumstances and for the purpose(s) stated below:

- 1) Username (nickname)
- 2) e-mail address
- 3) Selected password (encrypted)
- 4) Fictitious (imaginary) data that users add to their profile (name of the club, stadium name, etc.)
- 5) Time and date of registration and last login.
- 6) Server logs (IP address, access time, browser version)

It is **not possible** to register to the game through the use of third-party applications (Facebook, Google,...).

### On what basis do we process your personal information?

Your information is processed on the basis of your **consent** when you register to the game.

You gave us your consent to process the personal data you supplied when you registered to the game through the registration form.

Users of our services, under 16 years of age, can provide their personal data only with the express consent of their parents or legal guardian.

### **Whom can we forward your personal data?**

We **do not** share your personal data with third-parties.

### **Data retention period**

Data from the 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> line numbers (username, e-mail, and password) are stored for as long as the user is active in the game.

Data from the 4<sup>th</sup> line number is stored until the (inactive) account is replaced by a new user (with new (fictitious) names of the club, stadium, etc.)

Data from the 5<sup>th</sup> and 6<sup>th</sup> line numbers are intended for prevention of cheating. The data is kept for up to 1 year from the last users login into the game.

### **Usage of data**

Data from the 1<sup>st</sup>, 2<sup>nd</sup>, and 3<sup>rd</sup> line numbers (username, e-mail, password) are used to access and service the user account in the game.

Data from the 4<sup>th</sup> line number is used to display the information in the game – for displaying the club name on the league table, in simulated matches, and the like.

Data from 5<sup>th</sup> and 6<sup>th</sup> line numbers are used in prevention of cheating and for stopping one person from creating multiple accounts in the game.

### **Cookies**

Upon login into the game, the game assigns a session cookie. The cookie maintains the users login status. The game checks for it's existence upon each users interaction with the game.

A cookie is essential for ensuring proper operation of the game.

### **The rights of users of the game, to which the personal data relates to**

An individual, to whom the data relates to, has the following rights:

- 1) the right to revoke their consent: if personal data is kept and processed on the basis of consent, the data subject has the right to revoke his/her consent. The above does not affect the legality of data processing, which was carried out on the basis of consent, until cancellation.
- 2) the right to access the personal data: the individual, to whom the data applies to, has the right to see the personal data that is stored and processed.
- 3) the right to modify personal data: the administrator will, without undue delay, correct any inaccurate personal data.
- 4) the right to delete personal data: the administrator will, on the basis of a request, without undue delay, erase personal data, provided that the data is no longer needed for the purpose for which they were collected, if the person to whom the data applies to revokes their consent and there is no other legal basis for processing, or if the person to whom the data applies to opposes the processing and there are no other grounds to override the right to object.
- 5) the right to data transferability: the person, to whom the data applies to, has the right to forward the personal data to another operator, and the operator will not interfere with such a transfer or will transfer the personal data directly, if such is technically feasible.
- 6) the right to object to the processing of their personal data.
- 7) the right to lodge a complaint with the supervisory authority: The person, to whom the data applies to, has the right to appeal to the supervisory authority (Information Commissioner).

All requests, to exercise the right of the user, must be sent through the e-mail address **privacy@melderion.com**

## **Safety**

In order to prevent unauthorized access or disclosure of the data obtained, to maintain the accuracy of personal data, and to ensure their proper use, we use appropriate technical and organizational procedures and ensure the security of the data we collect.

Last updated : 4.11.2018