

# Privacy and cookie statement

## About us

*Information about Poki, our website and how to contact us.*

### Information on how Poki works

On our website you can play many games. By clicking on the tiles, you can select a game to play. Which games are available may depend on your location. If you click on a game, more information on how to play the game and who created the game is shown.

If you would like to keep track of your progress and access your progress from other devices or browsers, Poki offers the ability to create an account (Poki Accounts).

Age restriction: 13+

Our website is dedicated to website visitors of 13 years and older. If you are under the age of 13, this website is not meant for you. For our younger players Poki has launched a separate website: the [Poki Kids Website](#). The Poki Kids Website is a safe environment for children under the age of 13. To view our privacy practices specific for the Poki Kids Website, please refer to the privacy information on the [Poki Kids Website](#).

### Country version

If we did not correctly detect the country from which you are accessing our website, this can for instance be due to a VPN. If you are not sure why you see information for another country, please contact us. We can help you to find out what went wrong. It is important that you see the information applicable to your country. This for instance impacts what privacy rights you have and how we inform about this.

### Contact information

*If you have any questions, please contact us at [privacy@poki.com](mailto:privacy@poki.com) or by regular mail or phone. All contact options are specified in this section.*

If you have any questions, please contact us at [privacy@poki.com](mailto:privacy@poki.com) or via:

Poki B.V.

Spui 10

1012 WZ Amsterdam

The Netherlands

+31 20 2800 870 (for communication in Dutch or English)

If you want to talk to us on the phone in a different language, please send us an e-mail first and let us know. We'll give you the right phone number, so we can talk in the language you prefer.

## Data we use

### *Which data we use and why*

#### Which parties use your data?

*Poki uses your data to offer this website. But poki.com is not just made possible by us. We work together with others: game developers and advertising partners. They may also use your data. Game developers to create and improve games. Advertisers to show you ads about products or services you may like. Also note that if you leave our website, others may use your data.*

We use your data to offer our website. We use data to make the website work and to analyze how it's used. That way, we know what to improve. We do not share this data with other parties to use for their own purposes. But see below on other parties that may access your data for their own purposes.

All features on our website are available without registration. The games are accessible without an account. When you play a game, we do not register private information such as your name, email address or phone number. We only use such information if you actively contact us.

You can choose to create an account. If you do, your progress and the games you played are saved to your account. Please see more information below on which data is processed if you create an account.

[Poki.com](#) is not just made possible by us. We work together with others: game developers and advertising partners.

Game developers create the awesome games on our website. They sometimes use technologies such as so-called "cookies" to make their game work properly, or a similar technology. In this Privacy Statement, we will just keep calling these "cookies".

Advertising partners arrange for the advertisements (ads) you can see on our website. Ads are images or film clips that promote a product or service. The parties whose stuff is promoted pay for the ads being shown. That's how we keep our website free for you. Advertising partners sometimes use cookies to show the ads. They can show "contextual" ads. These ads are based on the "context", such as our website in general or the game you play. If you give consent for this, they can also show "personalized" ads, based on other info they have. This means that they show you ads that will likely interest you, based on for instance other websites you visited in the past.

Game developers and advertising partners may use cookies to get information about your interaction with what they offer on our site. They are responsible for complying with privacy laws for what they do. Poki also imposes strict rules on them to make sure as far as possible that they do what the law requires of them. In addition, Poki offers you information about how these cookies work. It is explained how you can for example disable them if you wish – see below.

#### Additional information on parties that use your data

##### Poki

Poki is in principle responsible for the processing of your data in the context of this website. We for instance use technical information about your device to make sure a game fits to your screen. We may also process personal data when you create an account via Poki Accounts.

Other parties may also be involved with using data of our website visitors. They are responsible themselves, as specified below.

Please [click here](#) for a full overview of the cookies placed directly by Poki or on behalf of Poki.

The overview includes information on the types and the names of the cookies, their purpose, what they are used for, whether it concerns a first or third-party cookie and the related validity period.

### Game developers

We do not make the games you can play on our Website. These games are created by game developers. Game developers sometimes use cookies or similar technologies. For example, to track how many points you earned during a game. When they use cookies or your data for this, they must of course comply with the privacy laws. To ensure they do this, we have taken various steps. Firstly, we have agreements in place with the developers and inform them of their responsibilities. The developers of the games on the Website are in principle required to remove all outgoing links and branding/advertisements from their game(s). Such as splash-screens, social links and app-store links. They are only allowed to include cookies and similar technologies in their game if they abide by the local privacy laws. We've prepared [this list](#) of the cookies used by our game developers, categorized per game, to inform you on behalf of the developers.\*

If developers do gather personal data for their own purposes, they are responsible for this, not Poki. Only the developer decides what (personal) data is processed and for what purpose. However, because Poki knows it is important that your data is also safe when you play a game, we take further steps to help us check that developers are complying with privacy laws. For example, we actively search for certain cookies and similar technologies that developers shouldn't be using on our Website. If we find any, we quickly contact the developer and may decide to stop offering their game on (part of) our Website. Also, we proactively block contact between a game and third-parties such as Google. This way, we prevent that developers can track you. They can only use cookies for the functioning of their game.

While we are proud of our measures to check on our developers' use of cookies, we do not control their games. Thus, we cannot prevent every inappropriate cookie or similar technology. Therefore, if you notice something that makes you wonder, please let us know!

\* Please note that this list may not be complete, since randomized cookies that are placed incidentally are not included in the list. Furthermore, the cookies used by developers may change over time. Therefore, we automatically update this list daily.

### Advertisers

If you provide consent for this, personalized advertisements - also called "behavioral advertising" - are shown. For personalized advertising, the advertisements shown are based on your behavior. For instance, if you click on an ad about a car on one website, another website may show you the same ad. To protect your privacy in this respect, Poki ensures, amongst other things, that suitable contracts are in place with these advertisers. Further information on the use of cookies, also by advertisers, can be found in the What about cookies section.

If you do not provide consent, we only show non-personalized ads. These ads are non-personalized ads "house ads" or non-personalized ads from third-parties. House ads are advertisements about other games available on the Poki Website, displayed by Poki. Other non-personalized ads can be contextual ads. These ads are selected based on the context - such as the game being played - instead of any information about you. The advertisers engaged are thoroughly vetted.

If you create a website and indicate that you are below the age of thirteen you are automatically referred to what we call the Privacy Friendly Mode. In this mode, we only show ads that are appropriate for all ages. The ads are non-personalized. This means that they are not selected based on any information about you. The ads are not “targeted” at you specifically. You can read more about our Privacy-Friendly Mode below.

### Games on other websites

The information in this Privacy Statement does not apply to the usage of your data by parties other than Poki that are responsible themselves (“data controllers”). This for instance includes providers of third-party games available via our website. Poki is not responsible for cookies that are placed by and for other parties when you visit another website (i.e. a non-Poki webpage). Such games are not hosted on our website, but e.g. on the website of the developer we work with. To play such a game, you need to access the website of that developer. This means that the owner of that website is responsible for the data it processes.

To help you decide when you go to websites outside of Poki, we show a banner if you play a game via our website that's actually hosted on another website (but still looks like the website of Poki). This banner tells you that you're going to a different website. It states: “Please note that this game is hosted on a third-party website.”. The company that offers the game on that other website is responsible for making sure they follow the privacy and data protection laws when they use your data for the game. Normally, Poki doesn't let other companies collect your personal data if you visit our Website. If a company does need to collect your personal data to offer the game, we'll require them to follow the law when they do so.

If you want to know more about any of the organizations we work with or have any other questions about privacy, please feel free to contact us via [privacy@poki.com](mailto:privacy@poki.com).

### What data do we use and what for?

*We collect the data we need to keep our website working, to show ads and for analytical purposes. Sometimes, we also use data to handle requests, for legal reasons, or for security and control. If you created an account and are below the age of thirteen you are automatically referred to our Privacy-Friendly mode. In Privacy-Friendly Mode, we try extra hard to use as little data as possible!*

We collect the data we need to keep our website working and some privacy-friendly analytical data. The main reason we use data is to make sure our website is safe and works well for you. We also use your data to save your game progress, so you can continue playing where you left off. If you create an account, you can also access your progress across devices and browsers.

Some technical data may be processed to show you ads. In the section Which parties use your data, we explain more about how we show advertisements (ads) and how this impacts your privacy or not.

Analytical data helps us to count things, like how many people visited the website. Please note that we do not use any of this analytical information to build a profile of you. We don't have separate files available about an individual user of our Website. We also do not use any of the data to treat you differently. We just use it to analyze and improve our website in general. And to report to the developers about statistics, such as how often their game was played.

Sometimes, we also use data to handle requests, for legal reasons, or for security and control. For instance, if someone thinks that a game is violating the law, we will investigate. And if someone reports a bug, we will look into this and try to solve the problem.

The personal data we use if you visit our website is included in the overview below. You see this overview if you click on “Data we use if you visit our website”. If you want more information about

what data we collect and why (and some other legal stuff), click on one of the headers in the sub-sections.

The "General information" section contains information that always applies. The last section contains an overview with more detailed info about how we use your data if you contact us.

If you wish to obtain more detailed information, please feel free to [reach out](#).

### General information

All features on the Website are available without the need for registration. To offer our website, Poki does collect certain electronic data. We may process this data in various ways.

Please find directly below some information about our use of your data in general ("general processing purposes"). Below that, you will find information on two legal grounds we sometimes rely on to use your data: the "legitimate interest" and "legal obligation." Please click on these topics for more information on this.

#### General processing purposes

In general, we may process your data for the following purposes:

- For maintenance (including debugging), administration and network and security purposes;
- For internal control and business operations;
- For developing, analyzing and improving the Website and our products;
- For handling any requests, complaints and disputes;
- For determining, exercising and defending our rights;
- For mergers or acquisitions of Poki or another company; and
- For complying with legal obligations (incl. fraud prevention) and requests of authorized governmental institutions.

#### Legitimate interest

We rely on the legal ground "legitimate interest". This means that a balance of interests is performed between the interests that are served by the processing on the one hand and your privacy interests on the other hand, and that the interests in favor of the processing prevail. The related legitimate interests are included below per topic. If you want more information about this, you can contact us directly via our contact details stated below.


#### Legal obligation

If we need to use your data to comply with a law, the legal ground is "legal obligation." In such cases, we will store your data for as far as we are legally obliged to do so, for instance to comply with statutory minimum retention periods.

### Data we use if you visit our website

We process your data for providing, maintaining, analyzing and improving the Website. We have specified this below.

The persons involved. We process personal data of the following (categories of) people:	People who visit our Website (Website Visitors).
The purpose of the processing. When you visit our website, we will process your data for the following purposes:	<ul style="list-style-type: none"><li>• For our general processing purposes as included above;</li><li>• For the functioning of the Website (incl. remembering your settings);</li></ul>

	<ul style="list-style-type: none"> <li>• For showing you the privacy information relevant to your region (which data we process exactly will depend on from which region you access the Website);</li> <li>• To show you advertisements (ads); and</li> <li>• To provide our services to you and to technically deliver content.</li> </ul>
The data that is processed. When you visit our website, we may process the following information about you which is collected automatically:	<ul style="list-style-type: none"> <li>• IP address;</li> <li>• Session and user ID;</li> <li>• Device type and screen specifics;</li> <li>• Browser type;</li> <li>• Country; and</li> <li>• Other technical information.</li> </ul>
Legal ground for the processing. We base the use of your data in the context of our website on the following legal ground(s):	<p>We base the use of your data in the context of the Website on the legitimate interest ground. It concerns our legitimate interest to secure, provide, analyze, and improve our services, as well as the developer's legitimate interest to obtain updates on the working and usage of their games in aggregated form.</p> <p>We ask consent to use certain cookies, such as to show you advertisements. Our Consent Management Platform includes an overview of the cookies for which you can give or withdraw consent. To access the Consent Management Platform follow the " Cookies" link in the footer.</p>

### Sensitive information


In the context of our website, we do not purposefully process sensitive information, such as information about your race or health.

### Why we use your data

Your personal data	Main reasons why we use it
IP address	This is a unique number. It's the number of the so-called computer network you use. We don't save this number. We only use this for your high-level geographic location (country-level, see below).
Session and user ID	This concerns the unique numbers we need to distinguish different users and sessions from one another. That way, we can for instance let developers know how many new people played their game that day.
Device type and screen specifics	We know what type of device you use and with what type of screen. We need this information to show the website and games in the right manner. You e.g. don't want a big game screen that doesn't fit on a smart phone.
Browser type	We know which type of browser you use (for example Chrome or Firefox). We need to know which browsers we need to support to make sure the games work in your browser. How it works in one browser is not always the same for another.
Country	We know in which country you are. We need this to ensure you see the right information for your country.
Other technical information	We also use other technical information to ensure that our website works properly, is secure and to analyze its usage. For example, information about the web pages that were visited, the links clicked and the log data.

## Data we use if you create an account via Poki Accounts

If you choose to create an account via Poki Accounts, we may process your data to create and maintain your account. Please note that we request your birthday to determine which types of advertisement we can show. We have specified this below.

The persons involved. We process personal data of the following (categories of) people:	People who create an account via Poki Accounts
The purpose of the processing. When you create an account, we will process your data for the following purposes:	<ul style="list-style-type: none"> <li>• For our general processing purposes as included above;</li> <li>• To create and maintain your account (incl. remembering your settings and progress);</li> <li>• To determine which advertisements (ads) can be shown to you; and</li> <li>• To provide our services to you and to technically deliver content.</li> </ul>
The data that is processed. When you create an account, we may process the following information about you which is collected automatically:	<ul style="list-style-type: none"> <li>• Persistent ID</li> <li>• User Agent</li> <li>• Location</li> <li>• Birthday</li> <li>• What games you played</li> <li>• Your progress within these games</li> <li>• Other personal data you input in a game (if applicable)</li> </ul>
Legal ground for the processing. We base the use of your data in the context of Poki Accounts on the following legal ground(s):	<p>We base the use of your data in the context of Poki Accounts on the legitimate interest ground. It concerns our legitimate interest to secure, provide, analyze, and improve our services (including Poki Accounts).</p> <p>We ask consent to use certain cookies, such as to show you advertisements. Our Consent Management Platform includes an overview of the cookies for which you can give or withdraw consent. To access the Consent Management Platform follow the “ Cookies” link in the footer.</p>

### Sensitive information

In the context of our website or Poki Accounts, we do not purposefully process sensitive information, such as information about your race or health.

### Why we use your data

Your personal data	Main reasons why we use it
Persistent ID	This is a unique number which is assigned to your account after you create an account via one of the sign in methods (Roblox, Google or Passkey). This number is necessary so that we know which account is yours.

User Agent	<p>We know which type of browser you use (for example Chrome or Firefox). We need to know which browsers we need to support to make sure the games work in your browser. How it works in one browser is not always the same for another.</p> <p>We know what type of device you use and with what type of screen. We need this information to show the website and games in the right manner. You e.g. don't want a big game screen that doesn't fit on a smart phone.</p>
Location	We know in which country you are. We need this to ensure you see the right information for your country.
Birthday	<p>We request your birthday to determine what sort of advertisements can be shown to you. If you are under the age of thirteen, you are automatically referred to Poki's Privacy-Friendly Mode. In this mode we only show non-personalized ads for all ages. If you are over thirteen years old, we may show personalized ads. Please note that we do not save your birthday. We will automatically convert birthday to 01-01-XXXX and add one year. For example: if your birthday is 12 May 2002, we will save your birthday as 01-01-2003. This way we save as little information as possible.</p>
What games you played	To ensure that you can access your progress, we need to remember what game you played.
Your progress within these games	We save your progress in all of the games you played within your account. This way – when you log in via a different browser or device – you can access your progress wherever you are.
Other data you input in a game (if applicable)	We save all information related to the games you play. That means that if you can provide additional information in a game, that information is also saved (such as your nickname). Therefore, please always choose a fictional nickname. It is forbidden to use your personal data. All rules about our website are included <a href="#">here</a> .

#### Poki's Privacy-Friendly Mode

For our youngest players, Poki has created a privacy-friendly mode ("Privacy-Friendly Mode"). In the Privacy-Friendly Mode we do not collect and use data, other than certain technical and privacy-friendly analytical data. In the Privacy-Friendly Mode we only use cookies and similar technologies with no or very limited privacy impact. These are: functional cookies, first-party (privacy-friendly) analytical cookies and tag management systems only. If you have created an account and indicated that you are under the age of thirteen (13), you are automatically referred to the Privacy-Friendly Mode.

The persons involved. We process personal data of the following (categories of) people:	People who create an account and are under the age of thirteen.
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<p>The purpose of the processing. When you visit the Website in Privacy-Friendly Mode, we will process your data for the following purposes:</p>	<ul style="list-style-type: none"> <li>• For our general processing purposes as included above;</li> <li>• For the functioning of the Website (incl. remembering your settings);</li> <li>• For showing you the privacy information relevant to your region (which data we process exactly will depend on from which region you access the Website); and</li> <li>• To provide our services to you and to technically deliver ads or content.</li> </ul>
<p>The data that is processed. When you visit the Website in Privacy-Friendly Mode, we may process the following information about you which is collected automatically:</p>	<ul style="list-style-type: none"> <li>• IP address;</li> <li>• Session and user ID;</li> <li>• Device type and screen specifics;</li> <li>• Browser type;</li> <li>• Country; and</li> <li>• Other technical information.</li> </ul>
<p>Legal ground for the processing. We base the use of your data in the context of the Website in Privacy-Friendly Mode on the following legal ground(s):</p>	<p>We base the use of your data in the context of the Website on the legitimate interest ground. It concerns our legitimate interest to secure, provide, analyze, and improve our services, as well as the developer's legitimate interest to obtain updates on the working and usage of their games in aggregated form.</p>

#### Data we use if you contact us

Poki may also process your personal data when you contact us.

<p>The persons involved. We process personal data of the following (categories of) people:</p>	<p>People who send an email to customer support, e.g. via <a href="mailto:hello@poki.com">hello@poki.com</a> or <a href="mailto:privacy@poki.com">privacy@poki.com</a>, as well as people who call us or ask us to call them.</p>
<p>The purpose of the processing. When you contact Poki customer support or contact Poki otherwise, we will process your data for the following purposes:</p>	<ul style="list-style-type: none"> <li>• For our general processing purposes as included above;</li> <li>• To provide you with support;</li> <li>• To fix the bug you informed us on; and</li> <li>• To answer any questions you have for us or to respond to your concerns.</li> </ul>
<p>The data that is processed. When you contact Poki customer support or contact Poki otherwise, we will process the following information about you:</p>	<ul style="list-style-type: none"> <li>• E-mail address or phone number;</li> <li>• Name (if you provide one);</li> <li>• The message you sent or shared with us; and</li> <li>• Related metadata.</li> </ul>
<p>Legal grounds for the processing. When you contact Poki customer support or contact Poki otherwise, we base the use of your data on the following legal ground(s):</p>	<p>We base the use of your data on the legitimate interest ground. It concerns our legitimate interest to provide you with support and answer any questions you have for us. Also, we refer to the other purposes mentioned above.</p>

## Sensitive information

If you contact us, we do not purposefully process sensitive information, such as information about your race or health. We therefore ask you not to share such information with us.

## Why we use your data

Sometimes, we use your data to handle requests or communications from you, or for legal reasons. The data we use if you contact us, is included in the overview below. We don't share this information with anyone else, unless necessary for legal reasons.

Your personal data	Main reasons why we use it
E-mail address	We receive your e-mail address if you send us a message on <a href="mailto:hello@poki.com">hello@poki.com</a> .
Phone number	If you ask us to contact you by phone, we use your phone number for this.
Name (if you provide one)	If you share your name with us, we will use it to respond to your questions or concern.
The message you sent or share with us	We will use your message to follow-up on for instance a bug that you told us about, or a question that you asked us.
Related metadata	If you send us a message, we will also use some technical data about the message. For instance, the date and time when you sent the message. We use this for security and to make sure we respond in time. The same applies if you call us.

## How do we get your data and who has access?

*When you play games on our website, we automatically receive some information from you. In addition, you may also share information when you contact us. Or we may gather information via other means. After obtaining your data, we may also share it with others as mentioned in this section. We only share your data if this is necessary, if confidentiality is ensured and if the privacy rules are complied with.*

When you play games on our website, we automatically receive some information from you. We use a special thing called a "cookie" (not the tasty kind you eat) for this. The cookie collects the information. This for instance includes information on the type of device you use, in order to properly show you the game. You can learn more about cookies in the section What about cookies. Next to this technical information, we only obtain information you share with us. For instance if you e-mail us.

We don't give your information to other people outside Poki to use for their own purposes. Within Poki, people only have access if they really need it. Only the people who need to use your data for their work, have access to it. For instance, some clever masterminds need your data to make sure everything runs smoothly. If something goes wrong, they fix it.

Sometimes, we ask other companies to help us with a service. For example, a company may help us make our website really fast. We make sure these companies can be trusted and only use your data for our needs. We don't share your data in any other way. We don't share your data with other companies to use for their own purposes.

Remember, certain companies may collect your personal data themselves through our website for their own purposes. See the section Which parties use your data? to learn more about this.

### How do we receive your data?

We obtain your data in various ways:

- **Automatically obtained.** Most data we obtain automatically via the Website, for example by using cookies and similar technologies. When your computer or mobile device contacts our web servers when you visit the Website, our web servers automatically collect usage information. Such usage information includes information about how you use and navigate our website. It can include how often a web page was visited and for how long. For further information on cookies, please see to section What about cookies.
- **Provided by you.** Some data about you, we receive straight from you. Examples include information you share if you use our contact form or if you create an account. In that case we receive the information you share with us directly from you.
- **Derived.** Certain data we do not receive directly, but can be derived from the information we already have. For example, information about the applicable law. We determine your location on country-level. We use this to show you the right version of our website and legal documents.
- **Obtained internally.** It is possible that we obtain your data via other Poki systems. An example is if users agree to participate in a user play test. This happens when we test if users of our website are happy with the way it works. We always look for how we can make it better. If you sign-up for a user play test, we can connect the data from the application form to the game play data.
- **Obtained from third parties.** Below we added some examples of third parties that may share data with us.
  - **Local authorities.** Sometimes we receive a request from local authorities to share data about players. For instance, if they are looking for a criminal. If we are legally required to share player data, we may share this. But only if this is allowed under the privacy laws as well.
  - **Developers.** In very rare cases, you may access a game that is running on the website of the developer. If so, this developer may share player data with us. We analyze the player data for the developer. E.g. to show how many players finish a level.
  - **Advertisers.** We may receive technical data from advertisers, e.g. to see whether an ad was clicked and was shown correctly. We need this information to check how much they need to pay for showing the ad.
  - **Service providers.** We cannot make all the technical magic happen ourselves. We pay service providers to help us. For instance, to make our website really fast. These service providers may share data with us.
- **Non-personal data.** Other (aggregated) information we receive is no longer considered personal data. This data is completely anonymized before we receive it. This means that we do not know to whom the data relates.

Who do we share your data with?

We only share your data with third parties - people outside Poki - if:

- **This is necessary.** If sharing the data is necessary for the service this party provides or its involvement. Sub-contractors, for example, will only get access to data which they need for their part of the service provision.
- **Confidentiality is ensured.** The persons within the third-party that have access to the data must treat your data confidentially. Where necessary, this is also agreed upon in a contract.

- The privacy rules are complied with. The third-party is obliged to comply with the applicable privacy rules. To make sure that they do, we may also include this in our contract with this party. This for instance means that the party is obligated to ensure appropriate technical and organizational security measures.

We may share your data on a need-to-know basis with the parties mentioned below. In this context, "need-to-know" means that a party only gets access to your data if and insofar as this is required for the professional services provided by this party.

- Poki personnel. Authorized persons, employed by Poki, who are involved with the processing activity concerned. Such as, the members of the support team you are in contact with.
- Personnel of our service providers. Authorized persons, employed by service providers/sub-contractors engaged by Poki, who are involved with the processing activity concerned. Such as, the service provider for Poki's internal processes.
- Advertisers. Advertisers on the Poki Website may receive information gathered by cookies for advertising purposes. For more information on the use of cookies please see the section [What about cookies](#).
- Authorized local authorities and more. Such as, courts, police, and law enforcement agencies. We may release information about our Website Visitors when we are legally required to do so. For instance at the request of local authorities or other governmental institutions conducting an investigation. Or to verify or enforce compliance with the policies governing the Website and applicable laws. We may also disclose such user information if we believe this is necessary to protect the rights, property or safety of Poki, or any of our business partners, customers or others.
- Non-personal data. We may also disclose non-identifying, aggregated user statistics to third parties for a variety of purposes. For instance, to describe our services to prospective game developers. Examples of such non-personal information include the number of users who visited this Website during a specific time period or played a specific game.

### What about data security and other countries?

*How do we keep your data secure? And how do we comply with the rules if your data is accessed from another country than your own country? These topics are discussed in this section.*

How do we secure your data?

Keeping your data safe is super important to us! We have done lots of things to make sure nothing bad happens to it. We have secret rules about security that only the people who work at Poki know about. These rules help us keep your data really safe! Everyone who works here is also trained to follow all the privacy rules. Also if something doesn't go according to plan.

#### More information

Protecting your privacy and data is very important to us. Therefore, Poki has applied appropriate technical and organizational measures to protect and secure personal data. This to prevent violations of the confidentiality, integrity and availability of the data. All Poki employees and other persons engaged by Poki for the processing of data are obliged to respect the confidentiality of personal data.

Poki has internal documents in which it is described how we safeguard an appropriate level of technical and organizational security. In addition, we have a data breach procedure in

which it is explained how (potential) data breaches need to be handled. We will, for example, inform the competent supervisory authority and involved individuals when this is required by the applicable law.

#### Is my data used in other countries?

Most likely, yes. We keep all our data in a country called the Netherlands (it's a really cool place, you should check it out!). If you visit our website from another country, your data travels between your country and the Netherlands.

Sometimes, we need help with how we use your data. The parties we ask to help us, do not determine how to use your data. We give them instructions. We also check if their privacy info is in order. The company that helps us out with the secure storage of your data, is located outside the United Kingdom (UK) or European Union (EU). But they store the data for us in the Netherlands. The company that helps us out to make our website fast, is also based outside the UK or EU. Both companies have extensive info on so-called data transfers. They inform on how any transfer of personal data from the UK to outside the UK or the EU is allowed under the law.

The info below informs you on how we - Poki - transfers your data. Other parties such as game developers and advertisers need to inform you themselves on how they transfer data.

#### To which countries do we transfer your data?

Poki stores your data in the Netherlands. For storing data, Poki uses BigQuery, a Google Cloud solution. The data is stored in the Netherlands. However, Google is headquartered in the US. How this relates to the transfer rules, is explained on [this webpage](#).

Poki uses the data of Cloudflare to make the Website fast. How Cloudflare makes sure that the transfer rules are complied with, is explained on [this webpage](#).

More generally, we can inform you as follows about the involvement of parties in other countries. In case your data is transferred from your country to another country, the transfer is legitimized in the manner described below.

#### Transfers outside your current country

Parties involved with the processing of your data may be located in a different country than you are. No matter where you are located, we are securing your personal data as much as reasonably possible.

EU transfers and UK transfers are legitimized in the manner described below. You may contact us for information on the legitimization of data transfers for other countries/regions or for more specific info. Our contact details are included in the About us section.

#### EU transfers

If your data is transferred from the EU to a party located outside the EU, we call this an 'EU transfer' (see [this link](#) for an overview of the EU countries). An EU transfer can in the first place be legitimized based on an adequacy decision of the European Commission, in which it is decided that the (part within the) third country in question ensures an adequate level of data protection. See [this link](#) for a summary of the applicable adequacy decisions.

If an EU transfer takes place for which there is no adequacy decision in place, we agree on the applicability of the relevant version of the Standard Contractual Clauses with the relevant party. This is a standard contract to safeguard the protection of your data, which is approved by the European Commission in which the parties fill out the appendices. See [this link](#) for the various versions of the Standard Contractual Clauses for the EU. Where appropriate, additional safeguards should be taken.

## UK transfers

If your data is transferred from the UK to a party located outside the UK, we call this a 'UK transfer'. A UK transfer can in the first place be legitimized based on an adequacy regulation of the UK government. See [this link](#) for an overview of the applicable adequacy regulations.

If a UK transfer takes place for which there is no adequacy regulation in place, we agree on the applicability of the relevant version of the EU Standard Contractual Clauses with the relevant party. This is a standard contract to safeguard the protection of your data, which is approved by the European Commission in which the parties fill out the appendices. See [this link](#) for the various versions of the Standard Contractual Clauses for the EU. A UK Addendum will be added to the Standard Contractual Clauses mentioned above, as required by UK law and regulations (see [this link](#)). Where appropriate, additional safeguards should be taken.

## For how long do we use your data?

*How do we determine for how long we keep your data? And what if you wish us to erase it sooner or keep it longer? That is what we explain in this section.*

### For how long do we use your data?

The cookies we use expire after up to six months. But remember, this period may be extended. If you come back to our website within six months, the six-month period starts again. If you do not want that, you can delete your cookies.

After a cookie is deleted or expired, we no longer know to whom the cookie data relates. If you have created an account, you will still be able to login after you have deleted your cookies. For more info on our retention policy, please see below.

#### How do we determine how long we keep your data?

In general, we do not keep your data for longer than what is necessary in relation to the purposes for which we process the data. There could however be exceptions applicable to the general retention terms.

The cookies we use expire after up to six months, without intermediate renewals. Poki can only "remember" a user during the validity period of a cookie. If cookies expire or are deleted, Poki can no longer determine to whom that information belongs. The six-month period restarts if you revisit our Website within six months without deleting our cookies. For info on how for how long cookies are set and on how to delete cookies, please see the section What about cookies.

Communication data with website users we in principle delete after two years. We only have this data if you have contacted us, e.g. via our contact form or via e-mail.

#### Exception: shorter retention period

If you exercise certain privacy rights, it is possible that Poki will remove your data earlier than the general applicable retention period or – oppositely – retain it for a longer period of time. For more information about this, please refer to the section What are my privacy rights?

#### Exception: longer retention period

In some situations, we process your data longer than is necessary for the purpose of the processing. This is for instance the case:

- Freedom of expression. If further usage of your data is necessary to exercise the right to freedom of expression and information.

# What about cookies

## *Learn about cookies and how to manage your cookie settings*

### General info on cookies

*In this section we explain about cookies in general: what are they and how do they work? We also explain what cookies are typically used for, how long they work and how you can check which cookies are used.*

#### What are cookies?

We talked a little bit about cookies before, but let's dive deeper! The cookies we talk about are not the tasty kind 😊. Technical cookies are tiny bits of information, used on your computer or smartphone. When a cookie from our website is used on your device, it helps us to recognize you every time you visit our website. The cookie will "remember" you unless you delete it or if it stops working because it's expired. Thanks to cookies, we can "remember" your language settings, which games you played, and how far you've progressed in those games.

#### More information

Cookies are small bits of data that can be placed on your computer, tablet, smartphone or other electronic "device" with which you can use the internet via a web browser. When a website is visited, the website can place these cookies on your device via your web browser. Examples of web browsers are: Microsoft Edge, Firefox, Safari, Google Chrome and Opera.

There are two different categories of cookies:

1. First party cookies. Cookies which Poki places on your device for its own purposes.
2. Third party cookies. Cookies placed by or for an external/third party (e.g. another company). On our Website it may concern cookies from game developers or advertising partners. This is explained in the section Which parties use your data?

#### Similar technologies

In addition to cookies, other techniques can also be used for similar purposes, such as so-called tag management systems and HTML Local Storage. Tag management systems are used to enable consent-choices. HTML5 Local Storage and local shared objects can be used for the same purposes as cookies. Below, when we speak of "cookies", we also mean the similar technologies described above, unless we say otherwise.

#### What are cookies used for?

Some cookies are necessary for the website to work properly. If we can't use them, the website won't work either. Other cookies are used to count things. We want to know how many people visited the website and how many people played your favorite game! These cookies aren't scary at all. They don't gather information which we include in a "profile" or something. That's why we use them without you having to say "Okay!"

#### More information

After a cookie is placed on your device, your device can be recognized as you browse through the Website via the same web browser. This will for instance enable us to "remember" your language settings, which games you played and your progress in these games.



For more information on cookies, please refer to [this webpage](#) of the European data protection authorities. the website [www.allaboutcookies.org](http://www.allaboutcookies.org).

For how long are cookies used?

After a cookie is placed on a device, it only works for a certain period: the validity period.

#### Default validity period

After the validity period of a cookie passes, the cookie is automatically removed by the web browser. For local storage: Poki will make sure that it is removed after the time specified in the [Cookie Table](#).

The validity period varies per cookie. For example, some cookies are only valid during the browser session. Other cookies can also recognize your device if you visit the Poki Website during a new browser session, e.g. for half a year after being placed.

The cookies we use expire after up to six months. But remember, this period may be extended. If you come back to our website within six months, the six-month period starts over again. If you do not want that, you can delete your cookies.

#### Early deletion/refusal of cookies

You can choose to delete a cookie manually before its validity period has passed. Depending on your country, you can also decide to refuse the cookies which may only be used with your consent. For more information on this, please see the section: [How can you change your cookie settings?](#)

After a cookie is deleted or expired, we no longer know to whom the cookie data relates. For more info on our retention policy, please see [For how long do we use your data?](#)

Does it matter which web browser I use?

Yes, it does. It differs per browser what the default cookie settings are. Please consider carefully which web browser you use. Some browsers may benefit from sharing your personal data, while others are completely independent. We advise you to research the available web browsers and decide for yourself which browser best suits your interests.

How can I look up the cookies being used?

Most browsers offer the option to check which cookies are being used. You type in "check cookies" plus the name of your browser, in the search engine you use. Then you will find various manuals on how to look up cookies in your browser, such as for Microsoft Edge, Mozilla Firefox, Google Chrome, Safari, Opera, Vivaldi and Yandex. Otherwise, there are also special plugins to check for cookies. And if you're up for a deep dive, the European Data Protection Authorities have published a [free website auditing tool](#). However, you need to be a bit tech-savvy to make this tool work.

### What type of cookies do we use?

*On our website, we use functional, analytical and advertising cookies. In this section we explain about these cookies.*

What type of cookies do we use?

Poki uses three types of cookies on the Poki Website: (1) functional cookies, (2) analytical cookies and (3) advertising cookies. More information on these categories is provided below.

For more detailed info on the exact cookies used on our website, please see the section

## Functional cookies

- **Definition:** Functional cookies are essential for the proper layout and navigation of a website. It concerns cookies (1) that are placed with the sole purpose of facilitating communication over an electronic communication network or (2) that are strictly necessary for providing you with the information-society service as requested by you.
- **No consent required:** Functional cookies may be placed without your consent.

## Analytical cookies

- **Definition analytical cookies:** Analytical cookies are used to analyze and map the use of a certain website, so that the quality and/or effectiveness of Poki's services can be improved.
- **Not always consent required:** We use privacy-friendly analytical cookies without consent. Poki does not need or request your consent to place cookies for obtaining information about the quality or effectiveness of a provided information-society service (analytical cookies), if this will have little or no impact on your private life.

## Advertising cookies

- **Definition advertising cookies:** Advertising cookies are used on our website to show ads. The cookie checks how the ad did. For instance, how long an ad was shown and whether it was clicked on. This determines how much is paid for the ad. Advertising cookies are set by the third parties with whom Poki runs advertising campaigns. Personalized advertising cookies are selected specifically for you. For instance, based on other ads you clicked on. In this way, Poki can show you ads that are likely more relevant to you, also on websites of other companies.
- **Consent required:** Personalized advertising cookies may only be placed with your prior consent.

## Who places which cookies?

*Some cookies are placed by Poki, some are placed by others, as explained in the section 'Additional information on parties that use your data'.*

## How can you change your cookie settings?


*In this section we explain how you can change your cookie settings for our website. We also included links to manuals on how to do this for the most used web browsers.*

### How can you change your cookie settings?

Please click below for info on how to delete cookies or change your cookie settings. But remember, if you delete our functional cookies, we won't be able to "remember" you anymore. For instance, we may no longer remember where you left off during a game. And if you manually block our functional cookies, some parts of our website may not work. All other cookies, you can refuse as you wish! This will have no impact on the proper working of our website.

Please note that deleting or refusing cookies does not mean that you will no longer see advertisements.

Via our website: How can I manage cookies via Poki?

On the Poki Website, you can change your cookie settings via this icon: . You will see it at the bottom of our website, on every webpage. You can change for which purposes your data

obtained via cookies may exactly be used, and/or specify per organization whether they may use your data or not. You can for instance also choose whether:

- Your location and information about device characteristics can be used;
- Ad and content performance can be measured and can be personalized based on a profile;
- Data can be used to build or improve user experience, systems and software; and
- Cookies, device identifiers, or other information can be stored or accessed on your device for the purposes presented to you.

Please note that the changes you make here only apply to this website. If you wish to change your cookie settings for all websites you visit, you can do so via your browser. For info on how to do this, see below under Via your browser: change cookies settings via your browser.

Via your browser: How can I manage cookies in general?

For most internet browsers it is possible to adjust the browser settings in such a way that you receive a warning before a cookie is placed. In most cases it is also possible to configure your browser to refuse all cookies or only third-party cookies. Furthermore, you can delete cookies which are already placed. Please keep in mind that it is necessary to adjust these settings separately on every different browser and device you use.

We have included links on how to change cookie settings on the most used internet browsers below:

Links to manuals of the most used browsers

[How to change cookies setting in Microsoft Edge](#)

[How to change cookies setting in Mozilla Firefox](#)

[How to change cookies setting in Google Chrome](#)

[How to change cookies setting in Safari](#)

[How to change cookies setting in Opera](#)

[How to change cookies setting in Vivaldi](#)

[How to change cookie settings in Yandex](#)

## Privacy settings

*What are my privacy rights? How do I change consent settings, change how long Poki stores my data, see what info Poki has about me?*

You can always ask what information we have about you. If you want, you can also ask us to delete your information or just keep it without using it anymore. If you think something is wrong with the information we have, you can ask us to fix it.

We don't use your information to create a profile or make decisions about you, but if we did, we would tell you. If you ever think we're not following the rules, you can tell the authorities (that's sort of the government). You can ask a grown-up to help you with this or ask us directly.

If you want to talk to us about any of these things, send us a message via the contact information below.

### What are your privacy rights?

In relation to our processing of your personal data, you have the following privacy rights. You have the right to not be discriminated against for exercising these privacy rights. To what extent you can exercise these rights may depend on the circumstances of the processing. Such as the manner in which Poki processes the personal data and the legal basis for the processing.

#### Right to withdraw consent

In so far as our processing of your data is based on your consent, you have the right to withdraw your consent.

If we obtain consent in another context, please note the following. Withdrawal of consent does not influence the legitimacy of the processing before you withdrew your consent. If you withdraw your consent, Poki will no longer process your data for the purpose that you consented to. It can however be possible that we still process the personal data for another purpose, such as to comply with a minimum retention period. In that case you will be informed about this.

#### Right of access

You have the right to request access to your data. This enables you to receive a copy of the data we hold about you (but not necessarily the documents themselves). We will then also provide you with further specifics of our processing of your personal data. For example, the purposes for which we process your data, where we got it from, and with whom we share it.

#### Right to rectification

You have the right to request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected. You have this right in case we process personal data about you that: (i) is factually incorrect; (ii) is incomplete or not related to the purpose it was collected for; or (iii) is in any other way used in a manner that is in conflict with an applicable law. The right of rectification is not intended for the correction of professional opinions, findings or conclusions that you do not agree with. However, Poki could in such case consider adding your opinion about this to your data.

Since we mainly process technical data, we are often not able to rectify your personal data. If the computer recorded that you accessed our Website at 15:12h CET, we cannot just change this in our records. If we are unable to rectify your data, we can offer you the option of deleting it instead.

#### Right to erasure

You have the right to request erasure of your personal data. This enables you to ask us to delete or remove your data where: (i) the data is no longer necessary, (ii) you have withdrawn your consent, (iii) you have objected to the processing activities, (iv) the data has been unlawfully processed, (v) the data has to be erased on the basis of a legal requirement, or (vi) where the data has been collected in relation to the offer of information society services.

However, we do not have to honor your request to the extent that the processing is necessary: (i) for exercising the right of freedom of expression and information, (ii) for compliance with a legal obligation which requires processing, (iii) for reasons of public interest in the area of public health, (iv) for archiving purposes, or (v) for the establishment, exercise or defense of legal claims.

#### Right to data portability

You have the right to request the transfer of your data in a structured, commonly used, machine-readable format to you or to a third party of your choice (right to data portability). Please note that this right only applies if it concerns processing that is carried out by us by automated means, and only if our processing ground for such processing is your consent or the performance of a contract to which you are a party (see What data do we use and what for?).

#### Automated decision-making

You have the right not to be subject to a decision based solely on automated processing, which significantly impacts you ("which produces legal effects concerning you or similarly significantly affects you"). In this respect, please be informed that when processing your personal data, we do not make use of automated decision-making which significantly impacts you.

#### Extra privacy rights in certain countries

In the countries/regions mentioned below, you have additional privacy rights. If you click on them, they unfold.

#### Right to object

You have the right to object to the processing of your data where we are relying on legitimate interest as processing ground (see above). Insofar as the processing of your data takes place for direct marketing purposes, we will always honor your request. For processing for other purposes, we will also cease and desist processing, unless we have compelling legitimate grounds which override your interests, rights and freedoms or that are related to the institution, exercise or substantiation of a legal claim. If such is the case, we will inform you on our compelling grounds and the balance of interests made.

You can also decide to refuse the cookies which may only be used with your consent. For more information on this, please see the section How can you change your cookie settings?

#### Right to restriction

The right to restriction of processing means that Poki will continue to store personal data at your request but may in principle not do anything further with it. In short, you have this right when Poki does not have (or no longer has) any legal grounds for the processing of your data or if this is under discussion. This right is specifically applicable in the following situations:

1. **Unlawful processing.** We may not (or no longer) process certain personal data, but you do not want us to erase the data. For example, because you still want to request the data at a later stage.

2. Data no longer required. Poki no longer needs your data for our processing purposes, but you still require the personal data for a legal claim. For example, in case of a dispute.
3. Pending an appeal. You objected against the processing of your data by Poki (see the right to object above). Pending the verification of your appeal we shall no longer process this personal data at your request.
4. Contesting the accuracy of data. You contest the accuracy of certain data that we process about you (e.g. via your right to rectification; see above). During the period in which we assess your contest we shall no longer process this personal data at your request.

#### Right to complaint

In addition to the above-mentioned rights, you have the right to lodge a complaint with a supervisory authority, in particular in Portugal, your place of work or where an alleged infringement took place. Please refer to [this webpage](#) for an overview of the supervisory authorities in the EU and their contact details. Please refer to [this webpage](#) for the supervisory authority in the UK.

We would appreciate the chance to deal with your concerns before you approach any supervisory authority, so please contact us beforehand.]

#### How can you make a privacy request?

You can exercise your privacy rights free of charge, by phone or by e-mail via our [contact details](#). If requests are manifestly unfounded or excessive, in particular because of the repetitive character, we will either charge you a reasonable fee or refuse to comply with the request.

Please note that if your request concerns data we obtained via cookies, you will also need to share certain cookie information with us. We need this data to determine which part of the data we hold, relates to you. No need to worry about how you will obtain this cookie information. If you contact us, we will inform you on how you can obtain and share the necessary information with us.

#### What happens after you make a privacy request?

We will respond to all requests without undue delay. If our full response will take more than a month due to complexity or number of requests, we will notify you of this and keep you updated. Furthermore, please note that we may request more information to confirm your identity before acting on any request.

The applicable (privacy) legislation may allow or require us to refuse your request. If we cannot comply with your request, we will inform you of the reasons why, subject to any legal or regulatory restrictions.