

SHADOW'S EDGE - PRIVACY POLICY

Effective Date: June 28, 2018

By using our products and services, you consent to our privacy policy.

We are committed to safeguarding the privacy of our players and users. This Privacy Policy explains how information about you is collected, used and disclosed by The Digging Deep Project, owner and developer of Shadow's Edge and all related products, websites and social media sites. ("The Digging Deep Project," "we," or "us").

The Digging Deep Project is a fiscally sponsored project of Community Initiatives. The Digging Deep Project is the publisher of Digging Deep and developer, distributor of Shadow's Edge.

The Digging Deep Project is not legally bound to be compliant with the Children's Online Privacy Protection Act ("COPPA") as Shadow's Edge is developed for and distributed to young people over the age of 13, nor does The Digging Deep Project have to comply with the Health Insurance Portability and Accountability Act ("HIPAA") as we do not provide commercial products.

However, we've developed our privacy practices to be in compliance with the requirements established by the Children's Online Privacy Protection Act ("COPPA") and the Health Insurance Portability and Accountability Act ("HIPAA2") as practicable. With this update of our privacy policy we are also complying with the new European GDPR regulation. This Privacy Policy applies to information we collect when you use our website, game, mobile applications and other online products and services (collectively, the "Services"). Please note that this Privacy Policy does not affect or impact any The Digging Deep Project products released prior to the Effective Date.

We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as by adding a statement to our homepage or mobile games and applications or by sending you an email notification).

We encourage you to review the Privacy Policy whenever you access the Services to stay informed about our information practices and the ways you can help protect your privacy.

This policy supplements our other policies relating to internet and email use. We may supplement or amend this policy by additional policies and guidelines from time to time. Any changes will be published on our websites: www.diggingdeep.org/terms and/or www.shadowside.com/terms respectively.

DATA CONTROLLER AND DATA PRIVACY OFFICER

The Digging Deep Project is classified as a data controller with respect to its internal processes and with respect to the products that it sells into the marketplace.

Our data privacy officer's contact details are:

Rosemary Lokhorst

rosemary@shadowesedge.com

Phone: +41 79 912 1550

Skype: lokhorstr

CHILDREN'S REQUIREMENTS [UNDER 13]

We require our players in our game to warrant that they are over the age of 13. Should we receive a request for a child under age 13 that wants to participate in our game, she or he will be asked to get permission from their parent or legal guardian before providing any personal information. We will use our best efforts to obtain such permission, which may include requiring a parent or legal guardian to submit a permission form via mail or a digital copy by e-mail. When verifiable parental consent is not obtained, we will only use the online contact information (such as e-mail) to respond directly to a child's request on a one-time basis and not use that information to re-contact the child for other purposes.

COLLECTION OF INFORMATION

We establish a lawful basis for processing data by asking for your consent to store and process your data before you can access our services.

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you create an account, manage your user profile, participate in any interactive features of the Services, request our e-newsletter or other marketing communications, participate in a promotion or survey, request customer support or otherwise communicate with us. The types of information we may collect include your name, email address, home town, photograph, self-selected nick-name or other identifier, password, social media posts and comments, screenshots from Shadowgram in Shadow's Edge, screenshots from the game that you share external to the game, messages between users and other contact or identifying information you choose to provide. Prize winners of contests or sweepstakes may also have to provide their Social Security Numbers, which are used exclusively for prize fulfilment and related tax purposes. As our game is created to support teens facing a serious illness, we also ask players for their illness and in which hospital they are being treated. We are using this information to understand who is interested in our products and to develop and deliver services.

Information We Collect Automatically When You Use the Services

When you access or use our Services, we automatically collect information about you, including:

- **Device Information:** We collect device-specific information when you access our Services from a mobile device, including your hardware model, operating system and version, unique device identifiers, mobile network information and country.

- **Use Information:** We collect information about your use of the Services, including the type of browser you use, access times, pages viewed, game play activity, interactions with other players, your IP address and the page you visited before navigating to our Services.
- **Information Collected by Cookies and Other Tracking Technologies:** We use various technologies to collect information, and this may include sending cookies to your computer or mobile device. Cookies are small data files stored on your hard drive or in device memory that helps us to improve our Services and your experience. They allow us to see which areas and features of our Services are popular and to count visits. We may also collect information using web beacons (also known as “tracking pixels”). Web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits, understand usage and campaign effectiveness and determine whether an email has been opened and acted upon. We collect this data to improve our service and make it more useful to you.
- Screenshots and information on them that are shared in the in-game community feature.
- We use Google analytics to collect audience demographic information, including but not limited to internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks to analyze trends, administer the site, and ensure that our site is accessible and viewable by our general audience. We do not have control over nor access to the information collected by this site and we recommend that you view their Privacy Policies for more information.

If you no longer want to have an account at any of our products, please email us and request to have your account deleted at privacy@shadowsedge.com.

USE OF INFORMATION

We may use information about you for various purposes, including to:

- Send you communications about products, services, rewards, and events offered by The Digging Deep Project and partners, and provide news and information we think will be of interest to you;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Respond to your comments, questions and requests and provide customer service;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Personalize and improve the Services and provide advertisements, content, suggested connections or features that match user profiles or activities;
- Process and deliver contest entries and rewards;
- Link or combine with information we get from others to help understand your needs and provide you with better service; and
- Carry out any other purpose for which the information was collected.

The Digging Deep Project is based in the United States and the information we collect is governed by U.S. law. By accessing or using the Services or otherwise providing information to us, you consent to the processing and transfer of information in and to the U.S. and other countries.

Accuracy and relevance

We will ensure that any personal data we process is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained.

We will not process personal data obtained for one purpose for any unconnected purpose unless you have agreed to this or would otherwise reasonably expect this.

Individuals may ask that we correct inaccurate personal data relating to them.

If you believe that information is inaccurate you should record the fact that the accuracy of the information is disputed and inform the persons responsible for GDPR compliance.

Furthermore, you can log a complaint with your national Information Commissioner.

RETAINING AND DELETING PERSONAL DATA

We retain personal data for no longer than is necessary. In general, personal data will not be kept for longer than 5 years after it is last used for the purpose for which it was collected.

You have the right to have any data unlawfully processed erased. You also have the right to withdraw your consent for processing at any time.

SHARING OF INFORMATION

We may share information about you as follows or as otherwise described in this Privacy Policy:

- With consultants and other service providers who need access to such information to carry out work on our behalf;
- In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;
- If we believe your actions are inconsistent with the spirit or language of our user agreements or policies, or to protect the rights, property and safety of The Digging Deep Project or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company; or
- In connection with research or impact studies carried out to measure the impact and use of our products. Any such information will be aggregated and de-identified and does not contain personal information. We only share personal information for research with your explicit consent and for specific studies that you have opted in for.
- With your consent or at your direction, including if we notify you through our Services that the information you provide will be shared in a particular manner and you provide such information.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

INTERNATIONAL TRANSFER OF DATA

Game data is stored on the Microsoft Azure Cloud Service and is being accessed from the US, Switzerland and the Netherlands.

You acknowledge that personal data that you submit for publication through our social media channels, website or Shadowgram may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

SOCIAL SHARING FEATURES

The Services may offer social sharing features and other integrated tools (such as the in game Shadowgram function to share images within the game, or such as Facebook “Like” button on our sites and social media), which let you share actions you take on our Services with other media, and vice versa. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit the privacy policies of the entities that provide these features.

ANALYTICS AND OTHER SERVICES PROVIDED BY OTHER COMPANIES

We may allow third parties to provide analytics services and provide you with other services, such as rewards programs. These third parties may use cookies, web beacons, your account information (that you set up with these third parties) and other technologies to collect information about you on our Services and other websites and online services, such as your IP addresses, identifiers associated with your mobile device or applications on the device, the browsers you use to visit our Services, pages viewed, time spent on pages, links clicked, and conversion information. These third parties may also share this information with their customers and clients. This information may be used by The Digging Deep Project, and these other companies to analyze and track data, determine the popularity of certain content, and better understand your usage. Some of these third-party service providers offer you a choice to opt out the collection of and/or sharing of this information. Please refer to their websites as to how to opt out.

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies.

SECURITY

The Digging Deep Project takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Where other organizations process personal data as a service on our behalf, the persons responsible for GDPR compliance will establish what, if any, additional specific data security arrangements need to be implemented in contracts with those third-party organizations.

ACCOUNT INFORMATION

You may reset your game, application or website account information, which includes your username, password and email address, by clicking on the password reset button in the game. If you wish to delete or deactivate your account, please email us at privacy@shadowsedge.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of your account information for a certain period of time.

COOKIES

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

PROMOTIONAL COMMUNICATIONS

We do not send promotional communications. We may send you transactional or relationship messages, such as those about your account or our ongoing player relations.

SURVEYS & CONTESTS

Occasionally, The Digging Deep Project, may request personal information from you via surveys or contests. Participation in surveys and contests is completely voluntary and not necessary for accessing the site. Personal information requested in surveys may include age, internet speed, and country. However, information collected in surveys will not be directly linked to you since we will not collect e-mail addresses or names associated with your survey. The requested information for contests typically includes name, address, and e-mail address, which is reasonably necessary for mailing prizes to contest winners. Information collected during contests will be used to notify the winners and award prizes only. All information collected from contests will be destroyed once the contest prizes have been awarded. Anonymous survey information will be used for purposes of monitoring or improving the use and satisfaction of The Digging Deep Project. Personal identifiable information will never be shared with third parties.

EXTERNAL LINKS

Our web site contains links to other sites. Please be aware that The Digging Deep Project, is not responsible for the privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of each and every web site that collects personally identifiable information. This privacy statement applies solely to information collected by this web site.

THIRD PARTY ANALYTICS AND ADVERTISING SERVICES

We do not sell, trade, or otherwise transfer to outside parties your personally identifiable information. This does not include trusted third parties who assist us in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

We do not have Advertising Services in our products.

We have identified the provider names of some of the third-party analytics and advertising services we use. Please refer to those third parties to learn more about the data practices of our third-party service providers. A list of such third-party providers is listed on www.shadowsedge.com/terms.

PRIVACY PRACTICES AND COMMUNITY GUIDELINES

We provide great care to protect the privacy of our players. The player's registration information and player content is stored on their local device and on a central service on Microsoft Azure.

User generated content can be shared in-game in Shadowgram. Such content is also stored centrally at the Microsoft Service. User generated content can further be shared by taking a screenshot and sharing that screenshot via the device to any media or save it locally. The Digging Deep Project is not responsible for any of such shared content.

We inform our players about the best practices of sharing and other community rules of engagement on our website in our Community Guidelines.

CONTACT US

If you have any questions about this Privacy Policy, or wish to report a violation, please contact us at: privacy@shadowsedge.com.

You may also contact our Privacy Policy Administrator by writing to:
Privacy Policy Administration
The Digging Deep Project
1000 Broadway, Suite 480, Oakland, CA 94607