

PRIVACY POLICY

Effective from September 1st, 2026

Your game data shouldn't be a mystery. This Privacy Policy explains what personal data DVE processes when you use our Games, websites and related services, why we use it, who we share it with, how long we keep it, and what rights and choices you have. This Policy is separate from our Terms of Service and End User License Agreement. Accepting the Terms does not amount to consent for processing that requires consent under applicable law.

1. Who We Are

This is the "who is actually responsible for your data" section.

DIGITAL VORTEX ENTERTAINMENT LTD ("DVE", "we", "us" or "our") is the controller of the personal data for which DVE determines the purposes and means of processing.

Company details:

- DIGITAL VORTEX ENTERTAINMENT LTD
- Registration number: HE 460715
- Registered office: Antrea Dimitriou, 5, Flat/Office 302, 1056 Nicosia, Cyprus
- Privacy requests: privacy@vortex.game

If a particular Game, website or feature is operated with another controller or requires a separate privacy notice, we will identify that arrangement where relevant.

2. Scope of This Policy

Not every DVE Game has every feature mentioned here. If a Game does not have a feature, the parts of this Policy about that feature do not suddenly apply.

This Privacy Policy applies to Games published or otherwise made available by or on behalf of DVE, and to websites, customer support, online features, playtests, community functionality and other services operated by or on behalf of DVE where this Policy is made available (together, the "**Services**").

A Game or feature may also have a short, game-specific privacy notice explaining processing that is unique to that Game or feature. If a specific notice conflicts with this general Policy, the specific notice will apply to that processing to the extent of the conflict.

Third-party Platforms such as Steam, process personal data under their own privacy policies when they operate their own accounts, stores, payment systems or platform services. This Policy does not replace those third-party privacy policies.

3. Personal Data We Process

Different parts of our Services generate different kinds of data. We try to collect what we actually need, not everything that could possibly be collected.

3.1. Information You Give Us

Depending on the Service and the way you interact with us, we may process information that you choose to provide, such as:

- your name, e-mail address and contact details when you contact customer support or send us a request;
- the content of your support request, bug report, feedback or other communication;
- information you submit when participating in a playtest, competition, survey or other voluntary activity;
- professional and creator information you submit through vortex.game, such as your Discord name, channel or media outlet, social-media or content-creator profile, approximate audience size, the Game or key you request, your preferred Platform and any additional information included in your request;
- newsletter subscription information, such as your e-mail address, consent status, subscription preferences, and records of subscription, withdrawal or unsubscription;
- business contact information and materials submitted in connection with a developer pitch, publishing enquiry, media request or other potential business relationship;
- User Generated Content (“UGC”), profile information or community content where the relevant Game or Service supports those features; and
- information reasonably necessary to investigate reports, enforce our Terms or respond to legal or intellectual-property complaints.

3.2. Gameplay and Technical Analytics

Some DVE Games use GameAnalytics to provide limited pseudonymous gameplay and technical analytics. In the current implementation, the analytics may include:

- a persistent random analytics identifier (user_id) generated when analytics starts;
- per-session and per-event identifiers, including session_id, session number and event identifiers;
- gameplay events and progression information intentionally instrumented in the relevant Game;
- session duration, cumulative session information and event timestamps;
- Game build and analytics SDK version;
- platform and operating-system information;
- technical device or hardware information, such as device/processor platform and manufacturer, where used for compatibility or performance analysis;
- connection type, where used for connectivity or performance analysis;
- country code, where used for a documented localisation, technical or product-analysis purpose;
- network information, including the IP address used to transmit analytics events to GameAnalytics; and
- device locale or country information processed by the analytics provider, where available and relevant to the documented analytics purposes.

The persistent analytics identifier is pseudonymous: it is designed to distinguish an installation or player over time without intentionally sending the player’s name, e-mail address or Platform account identifier to GameAnalytics.

3.3. Third-Party Platform Information

Where a Game is distributed or made available through a third-party platform, such as Steam (a “Platform”), the Platform operator independently processes personal data relating to your Platform account, store activity, payments, refunds and other Platform services in accordance with its own privacy policy.

DVE may receive aggregated sales, traffic, regional, wishlist or other performance information made available by a Platform. Where such information does not identify or relate to an identifiable individual, it is not personal data for the purposes of this Privacy Policy.

Where a particular Game uses Platform functionality that requires DVE or the relevant developer to process player-level information, additional personal data may be processed for that functionality. The relevant categories of data, purposes and other information required by applicable law will be identified in this Privacy Policy or, where appropriate, in a Game-specific or in-game privacy notice.

DVE does not receive payment-card details for purchases processed solely by a third-party Platform.

3.4. Website and Online Service Data

When you use a DVE website or other online Service, we may process standard technical information such as IP address, browser or device information, request logs, security events and information generated by cookies or similar technologies. Non-essential cookies or similar technologies are used only where permitted by applicable law and, where required, after obtaining consent. More information about the cookies and similar technologies currently used on our Website is provided in Section 7 of this Policy.

3.5. Security, Moderation and Enforcement Data

Where relevant to a particular Game or Service, we may process information reasonably necessary to detect or investigate cheating, fraud, abuse, security incidents, Terms violations, unlawful content or infringement. This may include reports from users, moderation records, technical security signals and relevant communications or content. We do not routinely review private communications solely for general monitoring unless disclosed for the relevant feature.

4. Where Personal Data Comes From

Most data comes from you, your Game or the Platform you use.

We may obtain personal data:

- directly from you when you contact us or submit information;
- automatically from a Game, Device, browser or Service when you use it;
- from a third-party Platform where the Platform makes relevant information available to DVE;
- from service providers acting on our behalf;
- from analytics technologies used on our Website, including Google Analytics, where enabled in accordance with applicable law;
- from other users when they submit reports or content involving you; or
- from public sources or competent authorities where reasonably necessary for legal, security or enforcement purposes.

5. Why We Use Personal Data and Our Legal Bases

We need a legal reason for processing personal data. The reason depends on what we are doing with it.

Purpose	Typical data	Typical legal basis	What this means
Provide and operate Games and Services	Information you provide; entitlement and technical information; service logs	Performance of a contract; legitimate interests	To provide features you request, maintain availability and

			administer the relevant Service.
Gameplay and product analytics	Pseudonymous gameplay events, session data, technical/device fields and analytics identifiers	Legitimate interests; consent where required by applicable law	To understand sessions and progression, identify drop-off points, assess balance and usability, and support evidence-based development and compatibility decisions.
Customer support and communications	Contact details, support messages, relevant technical information	Performance of a contract; legitimate interests	To respond to requests, diagnose issues and maintain records of support interactions.
Security, fraud prevention and enforcement	Security logs, reports, technical signals, relevant content and communications	Legitimate interests, including protecting our Games, Services, users and legal rights; compliance with a legal obligation to which DVE is subject, where applicable	To protect users, DVE, Games and Services, enforce rules and investigate misuse.
Purchases and entitlements	Entitlement status, transaction or order identifiers and limited Platform information made available to DVE	Performance of a contract; legitimate interests	To verify or recognize purchases and entitlements, provide access to purchased content or features, and address refunds, reversals or entitlement issues where relevant.
Legal compliance and claims	Relevant account, communication, transaction, content or technical records	Compliance with a legal obligation to which DVE is subject, where applicable; legitimate interests, including the establishment, exercise or defense of legal claims.	To comply with law, respond to authorities, protect legal rights and resolve disputes.
Surveys, playtests and other voluntary activities	Contact details, responses, feedback, preferences and information voluntarily submitted by you	Consent where required; legitimate interests where legally permitted	To conduct voluntary surveys, playtests, research or feedback activities and improve our Games and Services.
Developer and publishing enquiries	Business contact details, project information, pitch	Steps taken at your request before entering into a contract under Article 6(1)(b) GDPR,	To review publishing proposals, evaluate potential business relationships,

	materials and related communications	where applicable; legitimate interests in assessing and responding to business enquiries	communicate with developers and, where appropriate, take steps towards entering into an agreement.
Creator, press and key requests	Name, e-mail address, Discord name, channel or media outlet, creator profile, approximate audience size, requested Game or key, preferred Platform and related communications	Legitimate interests in assessing and responding to creator, press and media requests and promoting DVE's Games	To assess requests for review keys, press access, creator cooperation or other media-related opportunities and to communicate with you about the relevant request.
Newsletter and promotional communications	E-mail address, subscription preferences, consent records and, where enabled, delivery, opening or link-interaction information.	Consent	To send newsletters, Game announcements, trailers, offers and other promotional communications that you have requested. You can withdraw your consent or unsubscribe at any time.
Website analytics	Cookie and online identifiers, Website interaction data, page and referral information, browser/device information and approximate location	Consent	To understand how vortex.game is used and improve its content, usability and technical performance.

Where we rely on legitimate interests, those interests may include operating and improving our Games and Services, understanding how gameplay functions in practice, maintaining security and integrity, preventing fraud and abuse, supporting users, protecting legal rights and running our business effectively. We consider the impact on users and use safeguards such as pseudonymisation, data minimisation, access controls, retention limits and user choice where appropriate.

Where processing is based on consent, you may withdraw that consent at any time. Withdrawal does not affect processing that was lawful before consent was withdrawn.

You may also object at any time to the processing of your personal data for direct marketing purposes. Where you withdraw consent or object to direct marketing, we will stop using your personal data for that purpose, subject only to retaining a minimal suppression record where necessary to respect your choice.

5.1. When Providing Personal Data Is Necessary

Where we ask you to provide personal data, providing it may be necessary to enter into or perform a contract with you, comply with a legal requirement, respond to your request, or provide a particular feature or Service. If you do not provide information that is necessary for one of those purposes, we may be unable to provide the relevant feature, Service, support or other requested functionality. Where providing personal data or giving consent is optional, we will make this clear where appropriate. Refusing or withdrawing consent to optional processing will not affect access to the core Game or Service unless the relevant optional feature cannot reasonably operate without that processing.

6. Gameplay Analytics in More Detail

This is the “what exactly does GameAnalytics do?” section.

For the gameplay and technical analytics described above, DVE uses GameAnalytics, currently provided by GameAnalytics ApS, as an analytics service provider. For the core analytics service, GameAnalytics processes personal data on DVE’s behalf as a processor. Under its applicable data-processing terms, GameAnalytics may also process certain data for service optimization, security-incident detection and fraud prevention where permitted by law. To the extent that GameAnalytics determines independent purposes and means for any such processing, it may act as an independent controller in relation to that processing and is responsible for complying with applicable data-protection law.

The analytics are intended to help DVE:

- build and analyse gameplay progression funnels;
- understand completion of levels, quests and other stages;
- assess difficulty, balance, pacing and usability;
- measure the duration and number of gameplay sessions;
- identify points where players discontinue or abandon progression;
- compile statistics on intentionally instrumented in-game events and relevant technical events; and
- support decisions about fixes, balancing, design, compatibility, maintenance and further development.

Where DVE relies on legitimate interests for this processing, users in jurisdictions providing an applicable right to object may object on grounds relating to their particular situation. Where an in-game privacy or analytics control is available, you may use it to disable future non-essential gameplay analytics for the relevant Game or installation. Disabling analytics does not affect access to the core Game functionality unless otherwise required by law or technically necessary for a particular optional feature.

7. Cookies and Similar Technologies

This is the “what gets stored in your browser” section. We currently use a small number of analytics cookies on vortex.game, so we explain them here rather than sending you to another policy.

On vortex.game, DVE currently uses Google Analytics 4 (“GA4”), provided by Google, to understand how visitors use the Website and to support decisions about its content, usability and performance. GA4 currently uses the following first-party analytics cookies on vortex.game:

Cookie	Provider	Purpose	Duration
_ga	Google Analytics 4	Helps distinguish visitors and generate statistical information about how the Website is used.	1 year
_ga_VL43X02WH3	Google Analytics 4	Maintains measurement and session state for the GA4 property used on vortex.game.	1 year

These are persistent analytics cookies. They are not strictly necessary for the basic operation of the Website. Their current observed lifetime on vortex.game is one year. If the Website configuration changes or additional cookies or similar technologies are introduced, we will update this Policy where appropriate.

Where applicable law requires prior consent for analytics cookies or similar technologies, we use these technologies on the basis of your consent. Where applicable law requires consent, you may withdraw that consent through the consent-management mechanism made available on the Website or by using another method identified to you when consent is requested.

Google Analytics helps us produce statistics about use of the Website. Information generated through GA4 may be processed by Google as our analytics service provider and may be combined with technical information needed to provide and secure the service, subject to our configuration and Google's applicable terms. You can find additional information about Google's privacy practices at <https://policies.google.com/privacy> and about the Google Analytics opt-out browser add-on at <https://tools.google.com/dlpage/gaoptout>.

Depending on the Website configuration, GA4 may process online identifiers stored in cookies, page URLs and titles, referral information, timestamps, browser and operating-system information, device category, language, interaction events and approximate location information derived from the IP address used to connect to the service.

Google states that, for traffic from the EEA, Switzerland and the United Kingdom, individual IP addresses are used at collection for coarse geolocation and are discarded before the data is logged.

8. Who We Share Personal Data With

We do not need to hand data to everyone on the internet. We share it where there is a real operational, legal or technical reason.

Depending on the relevant Service, we may disclose personal data to:

- third-party Platform operators, such as Valve Corporation as operator of Steam, where information is exchanged in connection with distribution or Platform functionality actually used by the relevant Game;
- analytics and technology providers, including GameAnalytics for gameplay analytics and Google for Website analytics, where applicable;
- hosting, cloud, content-delivery, security, customer-support and other infrastructure providers;
- professional advisers, auditors and insurers where reasonably necessary;

- affiliates, developers, contractors or business partners involved in operating or supporting a Game or Service, subject to appropriate confidentiality and data-protection arrangements;
- competent authorities, courts or other persons where disclosure is required by law or reasonably necessary to protect rights, security or users; and
- a purchaser, successor or transaction counterparty in connection with a merger, acquisition, financing, restructuring or transfer of all or part of our business, subject to applicable law.

We do not disclose gameplay analytics for behavioural advertising or sell player profiles generated from the gameplay analytics described in Section 6.

Where required by applicable law, we enter into appropriate contractual arrangements with service providers and apply relevant data-protection and security requirements.

9. International Data Transfers

Some service providers operate globally, so data may travel outside Cyprus or the EEA.

DVE is established in Cyprus, but some service providers or their infrastructure may be located outside the European Economic Area (“**EEA**”). Depending on the provider and destination, appropriate safeguards may include an adequacy decision, participation in an applicable recognized data-transfer framework, or the European Commission’s Standard Contractual Clauses, together with supplementary measures where appropriate.

For GameAnalytics, its current EU Data Processing Addendum states that Customer Personal Data may be transferred outside the EEA and identifies U.S.-based infrastructure or analytics subprocessors supported by Standard Contractual Clauses. DVE reviews relevant transfer arrangements as part of vendor governance.

For Google Analytics, personal data may be processed by Google entities and infrastructure outside the EEA. Where required, such transfers are protected by an applicable adequacy decision, recognized data-transfer framework or the European Commission’s Standard Contractual Clauses.

You may contact us to obtain further information about the applicable transfer mechanism and, where relevant, a copy of the safeguards, subject to appropriate redactions necessary to protect confidential information.

10. How Long We Keep Personal Data

We keep data for a reason, not forever.

We periodically review our retention practices and may shorten retention periods where personal data is no longer necessary for the purpose for which it is processed. We retain personal data only for as long as reasonably necessary for the purposes described in this Policy, including to provide the relevant Service, maintain security, comply with legal obligations, resolve disputes and enforce agreements. The exact period depends on the type of data and the context in which it is processed.

When personal data is no longer required, we delete it, anonymise it, or put it beyond ordinary use until deletion from backup or recovery systems in accordance with our technical processes and applicable law.

11. Security

No security system is magic, but we take reasonable technical and organisational steps to protect personal data.

We use measures appropriate to the nature and risk of the processing, which may include access controls, encryption in transit, vendor-security reviews, logging, data minimisation, role-based access and organisational procedures designed to protect personal data against unauthorised or unlawful access, loss, alteration or disclosure.

No Internet-connected service can be guaranteed to be completely secure. If we become aware of a personal-data breach, we will assess and address it in accordance with applicable law, including any required notifications to authorities or affected individuals.

12. Children and Minors

Age ratings and privacy rules are related, but they are not the same thing.

Unless a game-specific privacy notice states otherwise, DVE's Games are intended for a general audience and are not specifically directed at children. DVE does not currently seek to collect a player's age or date of birth through the gameplay analytics described in this Policy and does not use that analytics to identify a player by name or Platform account.

We recognise that minors may nevertheless use some Games depending on the Game, age rating, jurisdiction and Platform. Where applicable law requires parental authorisation, age-based restrictions, enhanced transparency or other measures for a particular processing activity, DVE will apply those requirements.

Parents or legal guardians who believe that a child has provided personal data to DVE in circumstances where parental authorisation was required may contact us using the details in Section 17.

Where a particular Game is specifically directed at children or is expected to involve materially different processing of children's personal data, DVE may provide a separate or additional privacy notice and apply age-appropriate privacy measures for that Game.

13. Automated Decision-Making

This is the "robots don't get the final say" section. We may use automated tools to help with security, anti-cheat, fraud prevention or moderation, but we do not currently use them to make solely automated decisions with legal or similarly serious effects on you.

DVE does not currently use the personal data described in this Privacy Policy to make decisions based solely on automated processing, including profiling, that produce legal effects concerning you or similarly significantly affect you within the meaning of Article 22 GDPR.

We may use automated or technical tools to assist with security, fraud prevention, anti-cheat, moderation or enforcement where applicable. The use of such tools does not necessarily mean that a decision is made solely by automated means.

If DVE introduces automated decision-making that is subject to specific transparency, human-review or other safeguards under applicable law, we will provide the required information and safeguards before or when such processing applies.

14. Your Privacy Rights

Depending on where you live, you may have rights over your personal data. In the EEA, those rights are set out by the GDPR.

Subject to applicable law and relevant conditions or exceptions, you may have the right to:

- request access to personal data we hold about you;
- ask us to correct inaccurate or incomplete personal data;
- request deletion of personal data;
- request restriction of processing;
- receive certain personal data in a structured, commonly used and machine-readable format and, where applicable, have it transmitted to another controller;
- object to processing based on legitimate interests, including the gameplay analytics described in this Policy, on grounds relating to your particular situation;
- object at any time to processing for direct marketing;
- withdraw consent at any time where processing is based on consent; and
- lodge a complaint with a competent data-protection authority and seek a judicial remedy where available.

These rights are not absolute. For example, we may need to retain certain data to comply with law, establish or defend legal claims, maintain security, or respect the rights of others.

14.1. Exercising Your Rights

You may submit a privacy request to privacy@vortex.game or another privacy-request mechanism we make available. Please describe your request and, where relevant, identify the Game or Service involved.

Because gameplay analytics uses pseudonymous identifiers rather than a name or Platform account identifier, we may need information reasonably sufficient to locate the relevant analytics record. We will not require you to provide more information than reasonably necessary to verify and fulfil the request.

Where permitted by applicable law, we may ask for information reasonably necessary to verify your identity, confirm your authority to make the request, and locate the relevant records. Where a request is particularly complex or we have received multiple requests from you, we may extend the response period to the extent permitted by applicable law and will inform you where such an extension applies. Where permitted by applicable law, we may refuse to act on or charge a reasonable fee for requests that are manifestly unfounded or excessive, including because of their repetitive character.

Where permitted by applicable law, an authorised representative may submit a privacy request on your behalf. We may require reasonable evidence of the representative's authority and may separately verify your identity where appropriate.

We will respond within the period required by applicable law. Under the GDPR, this is generally without undue delay and within one month, subject to permitted extensions for complex or numerous requests.

14.2. Right to Object to Legitimate-Interest Processing

Where we rely on legitimate interests, you may object to the processing on grounds relating to your particular situation. We will stop the relevant processing unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.

Where an in-game privacy or analytics setting is available, you may use that control to disable future non-essential gameplay analytics for the relevant installation or Game. After analytics is disabled, DVE stops sending future non-essential gameplay analytics. We may retain a minimal record of the opt-out where necessary to respect and demonstrate your choice.

15. Complaints

You can contact us first, but you do not lose your right to go to a regulator.

If you have a privacy concern, you may contact DVE using the details below. If you are in the EEA and believe that our processing infringes applicable data-protection law, you also have the right to lodge a complaint with a competent supervisory authority, including the supervisory authority in the country of your habitual residence, place of work or the place of the alleged infringement.

As DVE is established in Cyprus, you may also contact the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus. Current contact and complaint information is available through the Commissioner's official website.

16. Changes to This Privacy Policy

Privacy practices can change when Games, technology or law changes. If the change matters, we will tell you as required.

We may update this Privacy Policy from time to time to reflect changes to our Games, Services, technology, service providers, legal requirements or privacy practices. The current version will be made available through an appropriate DVE website, Game, Platform page or other relevant location.

Where required by applicable law, we will provide additional notice or obtain consent before a change takes effect. The effective date at the top of this Policy indicates when the current version became effective.

17. Contact Us

Questions, requests, complaints - this is where to send them.

DIGITAL VORTEX ENTERTAINMENT LTD

Antrea Dimitriou, 5, Flat/Office 302, 1056 Nicosia, Cyprus

Privacy requests: privacy@vortex.game