

Privacy Policy

1. An overview of data protection

General information

The following information will provide you with an easy to navigate overview of what will happen with your personal data when you visit this website. The term “personal data” comprises all data that can be used to personally identify you. For detailed information about the subject matter of data protection, please consult our Data Protection Declaration, which we have included beneath this copy.

Data recording on this website

Who is the responsible party for the recording of data on this website (i.e. the “controller”)?

The data on this website is processed by the operator of the website, whose contact information is available under section “Information Required by Law” on this website.

How do we record your data?

We collect your data as a result of your sharing of your data with us. This may, for instance be information you enter into our contact form.

Other data shall be recorded by our IT systems automatically or after you consent to its recording during your website visit. This data comprises primarily technical information (e.g. web browser, operating system or time the site was accessed). This information is recorded automatically when you access this website.

What are the purposes we use your data for?

A portion of the information is generated to guarantee the error free provision of the website. Other data may be used to analyze your user patterns.

What rights do you have as far as your information is concerned?

You have the right to receive information about the source, recipients and purposes of your archived personal data at any time without having to pay a fee for such disclosures. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

Please do not hesitate to contact us at any time under the address disclosed in section “Information Required by Law” on this website if you have questions about this or any other data protection related issues.

Analysis tools and tools provided by third parties

When visiting our games, your surfing behaviour can be statistically evaluated. This is mainly done with so-called analysis programs.

For detailed information about these analysis programs please consult our Data Protection Declaration below.

2. Hosting and Content Delivery Networks (CDN)

External Hosting

The offers of seal Media GmbH are hosted by an external service provider (Hoster). The personal data collected on this website is stored on the hoster's servers. This may include IP addresses, contact requests, meta and communication data, contract data, contact details, names, website accesses and other data generated by a website.

The host is used for the purpose of fulfilling the contract with our potential and existing customers (Art. 6 para. 1 lit. b GDPR) and in the interest of secure, fast and efficient provision of our online services by a professional provider (Art. 6 para. 1 lit. f GDPR).

Our host will only process your data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

Execution of a contract data processing agreement

In order to guarantee processing in compliance with data protection regulations, we have concluded an order processing contract with our host.

3. General information and mandatory information

Data protection

The operators of this website and its pages take the protection of your personal data very seriously. Hence, we handle your personal data as confidential information and in compliance with the statutory data protection regulations and this Data Protection Declaration.

Whenever you use this website, a variety of personal information will be collected. Personal data comprises data that can be used to personally identify you. This Data Protection Declaration explains which data we collect as well as the purposes we use this data for. It also explains how, and for which purpose the information is collected.

We herewith advise you that the transmission of data via the Internet (i.e. through e-mail communications) may be prone to security gaps. It is not possible to completely protect data against third party access.

Information about the responsible party (referred to as the “controller” in the GDPR)

The data processing controller on this website is:

seal Media GmbH
Sophienblatt 21
24103 Kiel

Phone: +49 431 800 892 0
E-mail: info@sealmedia.de

The controller is the natural person or legal entity that single-handedly or jointly with others makes decisions as to the purposes of and resources for the processing of personal data (e.g. names, e-mail addresses, etc.).

Designation of a data protection officer as mandated by law

We have appointed a data protection officer for our company.

Dr. Christian Wolff
compolicy GmbH
An den Eichen 15
24248 Mönkeberg

Phone: +49 431 90 89 1636
E-mail: info@compolicy.de

Revocation of your consent to the processing of data

A wide range of data processing transactions are possible only subject to your express consent. You can also revoke at any time any consent you have already given us. This shall be without prejudice to the lawfulness of any data collection that occurred prior to your revocation.

Right to object to the collection of data in special cases; right to object to direct advertising (Art. 21 GDPR)

IN THE EVENT THAT DATA ARE PROCESSED ON THE BASIS OF ART. 6 SECT. 1 LIT. E OR F GDPR, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR PERSONAL DATA BASED ON GROUNDS ARISING FROM YOUR UNIQUE SITUATION. THIS ALSO APPLIES TO ANY PROFILING BASED ON THESE PROVISIONS. TO DETERMINE THE LEGAL BASIS, ON WHICH ANY PROCESSING OF DATA IS BASED, PLEASE CONSULT THIS DATA PROTECTION DECLARATION. IF YOU LOG AN OBJECTION, WE WILL NO LONGER PROCESS YOUR AFFECTED

PERSONAL DATA, UNLESS WE ARE IN A POSITION TO PRESENT COMPELLING PROTECTION WORTHY GROUNDS FOR THE PROCESSING OF YOUR DATA, THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR IF THE PURPOSE OF THE PROCESSING IS THE CLAIMING, EXERCISING OR DEFENCE OF LEGAL ENTITLEMENTS (OBJECTION PURSUANT TO ART. 21 SECT. 1 GDPR).

IF YOUR PERSONAL DATA IS BEING PROCESSED IN ORDER TO ENGAGE IN DIRECT ADVERTISING, YOU HAVE THE RIGHT TO AT ANY TIME OBJECT TO THE PROCESSING OF YOUR AFFECTED PERSONAL DATA FOR THE PURPOSES OF SUCH ADVERTISING. THIS ALSO APPLIES TO PROFILING TO THE EXTENT THAT IT IS AFFILIATED WITH SUCH DIRECT ADVERTISING. IF YOU OBJECT, YOUR PERSONAL DATA WILL SUBSEQUENTLY NO LONGER BE USED FOR DIRECT ADVERTISING PURPOSES (OBJECTION PURSUANT TO ART. 21 SECT. 2 GDPR).

Right to log a complaint with the competent supervisory agency

In the event of violations of the GDPR, data subjects are entitled to log a complaint with a supervisory agency, in particular in the member state where they usually maintain their domicile, place of work or at the place where the alleged violation occurred. The right to log a complaint is in effect regardless of any other administrative or court proceedings available as legal recourses.

Right to data portability

You have the right to demand that we hand over any data we automatically process on the basis of your consent or in order to fulfil a contract be handed over to you or a third party in a commonly used, machine readable format. If you should demand the direct transfer of the data to another controller, this will be done only if it is technically feasible.

SSL and/or TLS encryption

For security reasons and to protect the transmission of confidential content, such as purchase orders or inquiries you submit to us as the website operator, this website uses either an SSL or a TLS encryption program. You can recognize an encrypted connection by checking whether the address line of the browser switches from “http://” to “https://” and also by the appearance of the lock icon in the browser line.

If the SSL or TLS encryption is activated, data you transmit to us cannot be read by third parties.

Information about, rectification and eradication of data

Within the scope of the applicable statutory provisions, you have the right to at any time demand information about your archived personal data, their source and recipients as well as the purpose of the processing of your data. You may also have a right to have your data rectified or eradicated. If you have questions about this subject matter or any other questions about personal data, please do not hesitate to contact us at any time at the address provided in section “Information Required by Law.”

Right to demand processing restrictions

You have the right to demand the imposition of restrictions as far as the processing of your personal data is concerned. To do so, you may contact us at any time at the address provided in section “Information Required by Law.” The right to demand restriction of processing applies in the following cases:

- In the event that you should dispute the correctness of your data archived by us, we will usually need some time to verify this claim. During the time that this investigation is ongoing, you have the right to demand that we restrict the processing of your personal data.
- If the processing of your personal data was/is conducted in an unlawful manner, you have the option to demand the restriction of the processing of your data in lieu of demanding the eradication of this data.
- If we do not need your personal data any longer and you need it to exercise, defend or claim legal entitlements, you have the right to demand the restriction of the processing of your personal data instead of its eradication.
- If you have raised an objection pursuant to Art. 21 Sect. 1 GDPR, your rights and our rights will have to be weighed against each other. As long as it has not been determined whose interests prevail, you have the right to demand a restriction of the processing of your personal data.

If you have restricted the processing of your personal data, these data – with the exception of their archiving – may be processed only subject to your consent or to claim, exercise or defend legal entitlements or to protect the rights of other natural persons or legal entities or for important public interest reasons cited by the European Union or a member state of the EU.

Rejection of unsolicited e-mails

We herewith object to the use of contact information published in conjunction with the mandatory information to be provided in section “Information Required by Law” to send us promotional and information material that we have not expressly requested. The operators of this website and its pages reserve the express right to take legal action in the event of the unsolicited sending of promotional information, for instance via SPAM messages.

4. Recording of data on the company website (<https://seal.games>)

Cookies

Our websites and pages use what the industry refers to as “cookies.” Cookies are small text files that do not cause any damage to your device. They are either stored temporarily for the duration of a session (session cookies) or they are permanently archived on your device (permanent cookies). Session cookies are automatically deleted once you terminate your visit. Permanent cookies remain archived on your device until you actively delete them or they are automatically eradicated by your web browser.

In some cases it is possible that third party cookies are stored on your device once you enter our site (third party cookies). These cookies enable you or us to take advantage of certain services offered by the third party (e.g. cookies for the processing of payment services).

Cookies have a variety of functions. Many cookies are technically essential since certain website functions would not work in the absence of the cookies (e.g. the shopping cart function or the display of videos). The purpose of other cookies may be the analysis of user patterns or the display of promotional messages.

Cookies, which are required for the performance of electronic communication transactions (required cookies) or for the provision of certain functions you want to use (functional cookies, e.g. for the shopping cart function) or those that are necessary for the optimization of the website (e.g. cookies that provide measurable insights into the web audience), shall be stored on the basis of Art. 6 Sect. 1 lit. f GDPR, unless a different legal basis is cited. The operator of the website has a legitimate interest in the storage of cookies to ensure the technically error free and optimized provision of the operator's services. If your consent to the storage of the cookies has been requested, the respective cookies are stored exclusively on the basis of the consent obtained (Art. 6 Sect. 1 lit. a GDPR); this consent may be revoked at any time.

You have the option to set up your browser in such a manner that you will be notified any time cookies are placed and to permit the acceptance of cookies only in specific cases. You may also exclude the acceptance of cookies in certain cases or in general or activate the delete function for the automatic eradication of cookies when the browser closes. If cookies are deactivated, the functions of this website may be limited.

In the event that third party cookies are used or if cookies are used for analytical purposes, we will separately notify you in conjunction with this Data Protection Policy and, if applicable, ask for your consent.

Cookie Consent with Borlabs Cookie

Our website uses the Borlabs cookie consent technology to obtain your consent to the storage of certain cookies in your browser and for their data privacy protection compliant documentation. The provider of this technology is Borlabs - Benjamin A. Bornschein, Georg-Wilhelm-Str. 17, 21107 Hamburg, Germany (hereinafter referred to as Borlabs).

Whenever you visit our website, a Borlabs cookie will be stored in your browser, which archives any declarations or revocations of consent you have entered. These data are not shared with the provider of the Borlabs technology.

The recorded data shall remain archived until you ask us to eradicate them, delete the Borlabs cookie on your own or the purpose of storing the data no longer exists. This shall be without prejudice to any retention obligations mandated by law. To review the details of Borlabs' data processing policies, please visit <https://de.borlabs.io/kb/welche-daten-speichert-borlabs-cookie/>

We use the Borlabs cookie consent technology to obtain the declarations of consent mandated by law for the use of cookies. The legal basis for the use of such cookies is Art. 6 Sect. 1 Sentence 1 lit. c GDPR.

Contact form

If you submit inquiries to us via our contact form, the information provided in the contact form as well as any contact information provided therein will be stored by us in order to handle your inquiry and in the event that we have further questions. We will not share this information without your consent.

The processing of these data is based on Art. 6 para. 1 lit. b GDPR, if your request is related to the execution of a contract or if it is necessary to carry out pre-contractual measures. In all other cases the processing is based on our legitimate interest in the effective processing of the requests addressed to us (Art. 6 Para. 1 lit. f GDPR) or on your agreement (Art. 6 Para. 1 lit. a GDPR) if this has been requested.

The information you have entered into the contact form shall remain with us until you ask us to eradicate the data, revoke your consent to the archiving of data or if the purpose for which the information is being archived no longer exists (e.g. after we have concluded our response to your inquiry). This shall be without prejudice to any mandatory legal provisions – in particular retention periods.

Request by e-mail, telephone or fax

If you contact us by e-mail, telephone or fax, your request, including all resulting personal data (name, request) will be stored and processed by us for the purpose of processing your request. We do not pass these data on without your consent.

These data are processed on the basis of Art. 6 Sect. 1 lit. b GDPR if your inquiry is related to the fulfillment of a contract or is required for the performance of pre-contractual measures. In all other cases, the data are processed on the basis of our legitimate interest in the effective handling of inquiries submitted to us (Art. 6 Sect. 1 lit. f GDPR) or on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR) if it has been obtained.

The data sent by you to us via contact requests remain with us until you request us to delete, revoke your consent to the storage or the purpose for the data storage lapses (e.g. after completion of your request). Mandatory statutory provisions - in particular statutory retention periods - remain unaffected.

4.1. Recording of data in our Games

When you use our games, we collect and store certain information in order to provide our games and services and to improve the overall gaming experience:

- Temporary unique device identifiers and random device identifiers and user-related device identifiers (user IDs)
- Progress in the game and playing behaviour

- In-App purchases
- Language settings
- IP address
- Date and time of the game session
- Browser and version
- Operating system
- Hardware

IP addresses and other unique identifiers are theoretically traceable to the user or the device on which the game is played. To protect privacy, technical data identifiers are anonymized or deleted after your gaming session. All other data is used exclusively for statistical purposes to optimize the game. The purpose of temporary storage of this data is to establish a connection to our game servers, which is necessary for the provision of our games and services, and to offer you a more personal gaming experience. The legal basis is Art. 6 para. 1 lit. b DSGVO as well as the legitimate interest in accordance with the European data protection requirements under Art. 6 para. 1 lit. f DSGVO. In addition, we apply the above-mentioned security measures to protect all data.

Registration on this website

You can register within our games to use additional features. We will only use the data entered for this purpose for the purpose of using the respective offer or service for which you have registered. The mandatory data requested during registration must be provided in full. Otherwise we will refuse registration.

To notify you of any important changes to the scope of our portfolio or in the event of technical modifications, we shall use the e-mail address provided during the registration process.

We shall process the data entered during the registration process on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR).

The data recorded during the registration process shall be stored by us as long as you are registered on this website. Subsequently, such data shall be deleted. This shall be without prejudice to mandatory statutory retention obligations.

Registration with Facebook Connect

Instead of a direct registration within our games you can register with Facebook Connect. This service is provided by Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. However, according to Facebook, the data collected is also transferred to the USA and other third countries.

If you decide to register via Facebook Connect and click on the “Login with Facebook”/„Connect with Facebook” button, you will be automatically connected to the Facebook platform. There, you can log in using your username and password. As a result, your Facebook profile will be linked to this website or our services. This link gives us access to the data you have archived with Facebook. These data comprise primarily the following:

- Facebook name
- Facebook profile photo and cover photo
- Facebook cover photo
- E-mail address archived with Facebook
- Facebook-ID
- Facebook friends lists
- Facebook Likes (“Likes” information)
- Date of birth
- Gender
- Country
- Language

This information will be used to set up, provide and customize your account.

The registration via Facebook Connect and the affiliated data processing transactions are implemented on the basis of your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke this consent at any time, which shall affect all future transactions thereafter.

For more information, please consult the Facebook Terms of Use and the Facebook Data Privacy Policies. Use these links to access this information:

<https://www.facebook.com/about/privacy/> and <https://www.facebook.com/legal/terms/>.

Mobile apps and app permissions

When you download games as mobile apps or purchase in-app items through an app platform (such as the Apple App Store or Google Play Store), you submit certain information to that platform, including your account information, such as name, device ID, email address, and payment information. We have no control over and are not responsible for this data collection.

Some features of our games require access to certain features and services on your device. Depending on the mobile operating system you use, certain app permissions may need to be granted.

iOS

Push notifications: If you select OK in the "Allow Push Notifications" pop-up window, you allow the app to notify you about certain events in the game, even if the app is not currently open. You will then receive notifications in the form of sounds, messages and/or icons (an image or number on the app icon).

Game Center: Game apps may also connect to Apple's Game Center service, which is subject to Apple's Privacy Policy, available at <https://www.apple.com/privacy>. When you use the Service, for example to receive notifications of achievements, the personal information you share is visible to other users and can be read, collected or used by them. You should therefore carefully consider what personal information you wish to provide.

Android

External memory (change or delete your external memory, read the contents of your external memory): These functions allow an app to temporarily store content on your device. The app only uses its own memory space for this purpose. Other data on the external memory is not deleted, changed or read.

Internet connection (Get Internet data, full network access, view network and Wi-Fi connections): These features allow the app to retrieve data from the Internet and determine whether you are connected to the Internet via a Wi-Fi network or a mobile data connection. This is to prevent large amounts of data from consuming the possibly limited data volume.

Deactivate the hibernation mode: This feature allows the app to deactivate the phone's hibernation mode (for example, to display videos without turning off the screen).

To protect your privacy, all app permissions are optional, except for the technical permissions required to run the app. You can always refuse (by clicking "no" or "do not accept"). You can also revoke permissions later by changing the appropriate settings on your device.

The purpose of requesting these permissions is to provide the Game App and to keep you and the Game up to date on game updates, game-related news and notifications.

The legal basis for the required technical authorisations is the fulfilment of the contract in accordance with Art. 6 Paragraph 1 letter b DSGVO. The legal basis for optional authorisations is your consent in accordance with Art. 6 Para. 1 lit. a DSGVO.

5. Social media

Facebook plug-ins (Like & Share button)

Some of our products integrated plug-ins of the social network Facebook on this website. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook's statement the collected data will be transferred to the USA and other third-party countries too.

You will be able to recognize Facebook plug-ins by the Facebook logo or the "Like" button on this website. An overview of the Facebook plug-ins is available under the following link: <https://developers.facebook.com/docs/plugins/>.

Whenever you visit this website and its pages, the plug-in will establish a direct connection between your browser and the Facebook server. As a result, Facebook will receive the information that you have visited this website with your plug-in. However, if you click the Facebook "Like" button while you are logged into your Facebook account, you can link the content of this website and its pages with your Facebook profile. As a result, Facebook will be able to allocate the visit to this website and its pages to your Facebook user account. We have to point out, that we as the provider of the website do not have any knowledge of the transferred data and its use by Facebook. For more detailed information, please consult the Data Privacy Declaration of Facebook at: <https://www.facebook.com/privacy/explanation>.

If you do not want Facebook to be able to allocate your visit to this website and its pages to your Facebook user account, please log out of your Facebook account while you are on this website.

The use of the Facebook plug-in is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

Twitter plug-in

Some of our products integrated functions of the social media platform Twitter into this website. These functions are provided by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. While you use Twitter and the “Re-Tweet” function, websites you visit are linked to your Twitter account and disclosed to other users. During this process, data are transferred to Twitter as well. We must point out, that we, the providers of the website and its pages do not know anything about the content of the data transferred and the use of this information by Twitter. For more details, please consult Twitter’s Data Privacy Declaration at: <https://twitter.com/en/privacy>.

The use of Twitter plug-ins is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in being as visible as possible on social media. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

You have the option to reset your data protection settings on Twitter under the account settings at <https://twitter.com/account/settings>.

Instagram plug-in

Some of our products integrated functions of the public media platform Instagram into this website. These functions are being offered by Instagram Inc., 1601 Willow Road, Menlo Park, CA 94025, USA.

If you are logged into your Instagram account, you may click the Instagram button to link contents from this website to your Instagram profile. This enables Instagram to allocate your visit to this website to your user account. We have to point out that we as the provider of the website and its pages do not have any knowledge of the content of the data transferred and its use by Instagram.

Data are stored and analyzed on the basis of Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in the highest possible visibility on social media. If a respective declaration of consent has been obtained, the data will be processed exclusively on the basis of Art. 6 Sect. 1 lit. a DGDPR. Any such consent may be revoked at any time.

For more information on this subject, please consult Instagram’s Data Privacy Declaration at: <https://instagram.com/about/legal/privacy/>.

6. Analysis tools and advertising

Google Analytics

Within our games we use functions of the web analysis service Google Analytics. The provider of this service is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Analytics enables the website operator to analyze the behavior patterns of website visitors. To that end, the website operator receives a variety of user data, such as pages accessed, time spent on the page, the utilized operating system and the user's origin. Google may consolidate these data in a profile that is allocated to the respective user or the user's device.

Google Analytics uses technologies that make the recognition of the user for the purpose of analyzing the user behavior patterns (e.g. cookies or device fingerprinting). The website use information recorded by Google is, as a rule transferred to a Google server in the United States, where it is stored.

This analysis tool is used on the basis of Art. 6 Sect. 1 lit. f GDPR. The operator of this website has a legitimate interest in the analysis of user patterns to optimize both, the services offered online and the operator's advertising activities. If a corresponding agreement has been requested (e.g. an agreement to the storage of cookies), the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

IP anonymization

We have activated the IP anonymization function. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. The full IP address will be transmitted to one of Google's servers in the United States and abbreviated there only in exceptional cases. On behalf of the operator of this website, Google shall use this information to analyze your use of this website to generate reports on website activities and to render other services to the operator of this website that are related to the use of the website and the Internet. The IP address transmitted in conjunction with Google Analytics from your browser shall not be merged with other data in Google's possession.

Browser plug-in

You can prevent the recording and processing of your data by Google by downloading and installing the browser plugin available under the following link:

<https://tools.google.com/dlpage/gaoptout?hl=en>.

For more information about the handling of user data by Google Analytics, please consult Google's Data Privacy Declaration at:

<https://support.google.com/analytics/answer/6004245?hl=en>.

Contract data processing

We have executed a contract data processing agreement with Google and are implementing the stringent provisions of the German data protection agencies to the fullest when using Google Analytics.

Demographic parameters provided by Google Analytics

Within our games we uses the “demographic characteristics” function of Google Analytics, to be able to display to the website visitor compatible ads within the Google advertising network. This allows reports to be created that contain information about the age, gender and interests of the website visitors. The sources of this information are interest-related advertising by Google as well as visitor data obtained from third party providers. This data cannot be allocated to a specific individual. You have the option to deactivate this function at any time by making pertinent settings changes for advertising in your Google account or you can generally prohibit the recording of your data by Google Analytics as explained in section “Objection to the recording of data”.

Google Analytics E-Commerce-Tracking

Within our games we uses the “E-Commerce Tracking” function of Google Analytics. With the assistance of E-Commerce Tracking, the website operator is in a position to analyze the purchasing patterns of website visitors with the aim of improving the operator’s online marketing campaigns. In this context, information, such as the orders placed, the average order values, shipping costs and the time from viewing the product to making the purchasing decision are tracked. These data may be consolidated by Google under a transaction ID, which is allocated to the respective user or the user’s device.

Archiving period

Data on the user or incident level stored by Google linked to cookies, user IDs or advertising IDs (e.g. DoubleClick cookies, Android advertising ID) will be anonymized or deleted after 14 month. For details please click the following link:

<https://support.google.com/analytics/answer/7667196?hl=en>

WordPress Stats

This website (<https://seal.games>) uses the WordPress tool Stats in order to statistically analyze user access information. The provider of the solution is Automattic Inc., 60 29th Street #343, San Francisco, CA 94110-4929, USA.

WordPress Stats uses technologies that enable cross-page recognition of users for the purpose of analyzing the user patterns (e.g. cookies or device fingerprinting). The collected information concerning the use of this website is stored on servers in the United States. Your IP address is rendered anonymous after processing and prior to the storage of the data.

The storage of “WordPress Stats” cookies and the use of this analysis tool is based on Art. 6 Sect. 1 lit. f GDPR. The website operator has a legitimate interest in the anonymous analysis of user patterns, in order to optimize the operator’s web offerings and advertising. If a

corresponding agreement has been requested (e.g. an agreement to the storage of cookies), the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

You do have the option to object to the collection and use of your data for future implications by placing an opt out cookie into your browser by clicking on the following link: <https://www.quantcast.com/opt-out/>.

If you delete the cookies on your computer, you must set the opt-out cookie again.

Google Ads

Within our games we uses Google Ads. Google Ads is an online promotional program of Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Ads enables us to display ads in the Google search engine or on third party websites, if the user enters certain search terms into Google (keyword targeting). It is also possible to place targeted ads based on the user data Google has in its possession (e.g. location data and interests; target group targeting). As the website operator, we can analyze these data quantitatively, for instance by analyzing which search terms resulted in the display of our ads and how many ads led to respective clicks.

The use of Google Ads is based on Art. 6 Sect. 1 lit. et seq. GDPR. The website operator has a legitimate interest in marketing the operator’s services and products as effectively as possible.

Google AdSense (not personalized)

Within our games we uses Google AdSense, an ad embedding service provided by Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

We use Google AdSense in the “non-personalized” mode. Contrary to the personalized mode, the ads are not based on your previous user patterns and the service does not generate a user profile for you. Instead, the service uses so-called “context information” to choose the ads that are posted for you to view. The selected ads are thus based e.g. on your location, the content of the website you are visiting at the time or the search terms you are using. To learn more about the distinct differences between personalized targeting and targeting that has not been personalized by Google AdSense, please click on the following link: <https://support.google.com/adsense/answer/9007336>.

Please keep in mind that if Google AdSense is used in the non-personalized mode, it is possible that cookies are stored or comparable recognition technologies (e.g. device fingerprinting) are used.

AdSense is used on the basis of Art. 6 Abs. 1 lit. et seq. GDPR. The website operator has a legitimate interest in making the marketing of the website as effective as possible. If a respective declaration of consent was requested, processing shall occur exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

Google is certified in accordance with the "EU-US Privacy Shield". The Privacy Shield accord was executed between the European Union and the United States with the aim of ensuring that European Data Protection Standards are observed in conjunction with the processing of data in the United States. Every company that is certified in accordance with the Privacy Shield regulations undertakes to comply with these data protection standards.

You have the option to autonomously adjust the advertising settings in your user account. To do so, please click on the link provided below and log in:
<https://adssettings.google.com/authenticated>.

For more information about Google's advertising technologies, please click here:
<https://policies.google.com/technologies/ads>
<https://www.google.de/intl/de/policies/privacy/>.

unityAds

Within our games we use unityAds from our partner Unity Technologies (Unity Technologies, 30 3rd Street, San Francisco, CA 94103, USA; Unity Technologies GmbH, Ritterstrasse 11, 10969 Berlin, Germany). Unity uses technologies to control and optimize the display of advertising material for the user.

Only pseudonymous usage data is processed as protective measures and the user has the right to object. If you wish to object to the collection of anonymised information, you can do so at <https://unity3d.com/de/legal/cookie-policy#cookies>. Alternatively, you can make or object to settings for data processing via the link "unity Privacy" in the games app.

We have also entered into an agreement with Unity pursuant to Art. 26 DSGVO, according to which both we and Unity are responsible for the processing of your data.

You can therefore contact us as well as Unity regarding questions of data processing. Contact details can be found at: <https://unity3d.com/de/contact/addresses>

Unity has concluded so-called Binding Corporate Rules (BCR) to safeguard and justify international data transfers between its own companies. These are data protection agreements which ensure that a uniform level of data protection is in place at all companies.

The legal basis is their consent in accordance with Art. 6 para. 1 lit. a) DSGVO, which is given before activating the video player and playing out advertising videos by confirming the button on the preview page.

Google Admob

Within our games we use Google Admob of Google LLC, 1600 Amphitheatre Parkway

Mountain View, CA 94043, USA, EU branch: Google Ireland Ltd, Gordon House, Barrow Street, Dublin 4, Ireland.

With Admob, personalised advertising can be displayed in an app. Google collects, in particular, device, usage and location data from the end device by means of software

integrated into the respective app. Google can use this data to select advertisements based on the user's interests and display them to the user. Google also uses the data to further optimise its services. Information on Google's data processing can be found in the privacy policy: <https://policies.google.com/technologies/partner-sites>

In order to carry out the service, Google also passes on data to advertising networks. A list of these networks and their privacy policies can be found here:

<https://support.google.com/admanager/answer/9012903>

Only pseudonymous usage data are processed as protective measures. You can make settings for data processing in the respective game app under the link "Admob Privacy".

Google provides contractual conditions for the use of the service, according to which seal Media GmbH and Google are independently responsible for data processing:

<https://privacy.google.com/businesses/controllerterms/>.

Google has had itself certified under the so-called EU-US Privacy Shield and has thus proven an appropriate level of data protection:

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI>

The legal basis is their consent in accordance with Art. 6 Para. 1 lit. a) DSGVO, which is given before activating the video player and before playing out advertising videos by confirming the button on the preview page.

Google Remarketing

Within our games we use the functions of Google Analytics Remarketing. The provider of these solutions is Google Ireland Limited ("Google"), Gordon House, Barrow Street, Dublin 4, Ireland.

Google Remarketing analyzes your user patterns on our website (e.g. clicks on specific products), to allocate a certain advertising target groups to you and to subsequently display matching online offers to you when you visit other online offers (remarketing or retargeting).

Moreover, it is possible to link the advertising target groups generated with Google Remarketing to device encompassing functions of Google. This makes it possible to display interest-based customized advertising messages, depending on your prior usage and browsing patterns on a device (e.g. cell phone) in a manner tailored to you as well as on any of your devices (e.g. tablet or PC).

If you have a Google account, you have the option to object to personalized advertising under the following link: <https://www.google.com/settings/ads/onweb/>.

The use of Google Remarketing is based on Art. 6 1 lit. et seq. GDPR. The website operator has a legitimate interest in the marketing of the operator's products that is as effective as possible. If a respective declaration of consent was requested, processing shall occur

exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

For further information and the pertinent data protection regulations, please consult the Data Privacy Policies of Google at: <https://policies.google.com/technologies/ads?hl=en>.

Google Conversion-Tracking

Within our games we uses Google Conversion Tracking. The provider of this service is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

With the assistance of Google Conversion Tracking we are in a position to recognize whether the user has completed certain actions. For instance, we can analyze the how frequently which buttons on our website have been clicked and which products are reviewed or purchased with particular frequency. The purpose of this information is to compile conversion statistics. We learn how many users have clicked on our ads and which actions they have completed. We do not receive any information that would allow us to personally identify the users. Google as such uses cookies or comparable recognition technologies for identification purposes.

We use Google Conversion Tracking on the basis of Art. 6 Sect. 1 lit. et seq. GDPR. The operator of the website has a legitimate interest in the analysis of the user patterns with the aim of optimizing both, the operator’s web presentation and advertising. If a respective declaration of consent was requested (e.g. concerning the storage of cookies), processing shall occur exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR; the given consent may be revoked at any time.

For more information about Google Conversion Tracking, please review Google’s data protection policy at: <https://policies.google.com/privacy?hl=en>

Facebook Pixel

To measure conversion rates, our games uses the visitor activity pixel of Facebook. The provider of this service is Facebook Ireland Limited, 4 Grand Canal Square, Dublin 2, Ireland. According to Facebook’s statement the collected data will be transferred to the USA and other third-party countries too.

This tool allows the tracking of page visitors after they have been linked to the website of the provider after clicking on a Facebook ad. This makes it possible to analyze the effectiveness of Facebook ads for statistical and market research purposes and to optimize future advertising campaigns.

For us as the operators of this website, the collected data is anonymous. We are not in a position to arrive at any conclusions as to the identity of users. However, Facebook archives the information and processes it, so that it is possible to make a connection to the respective user profile and Facebook is in a position to use the data for its own promotional purposes in compliance with the [Facebook Data Usage Policy](#). This enables Facebook to display ads on

Facebook pages as well as in locations outside of Facebook. We as the operator of this website have no control over the use of such data.

The use of Facebook Pixel is based on Art. 6 Sect. 1 lit. f GDPR. The operator of the website has a legitimate interest in effective advertising campaigns, which also include social media. If a corresponding agreement has been requested (e.g. an agreement to the storage of cookies), the processing takes place exclusively on the basis of Art. 6 para. 1 lit. a GDPR; the agreement can be revoked at any time.

In Facebook's Data Privacy Policies, you will find additional information about the protection of your privacy at: <https://www.facebook.com/about/privacy/>.

You also have the option to deactivate the remarketing function "Custom Audiences" in the ad settings section under https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen. To do this, you first have to log into Facebook.

If you do not have a Facebook account, you can deactivate any user based advertising by Facebook on the website of the European Interactive Digital Advertising Alliance: <http://www.youronlinechoices.com/de/praeferenzmanagement/>.

7. Newsletter

MailChimp with deactivated success measurement

We use the services of MailChimp to send out its newsletters. The provider is the Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

Among other things, MailChimp is a service that can be deployed to organize the sending of newsletters. Whenever you enter data for the purpose of subscribing to a newsletter (e.g. your e-mail address), the information is stored on MailChimp servers in the United States. We have deactivated the success measurement of Mailchimp, so Mailchimp will not evaluate your behavior when opening our newsletter.

MailChimp is in possession of a certification that is in compliance with the "EU-US-Privacy-Shield." The "Privacy-Shield" is a compact between the European Union (EU) and the United States of America (USA) that aims to warrant the compliance with European data protection standards in the United States.

If you do not want MailChimp to receive your data, you must unsubscribe from the newsletter. We provide a link for you to do this in every newsletter message. Moreover, you can also unsubscribe from the newsletter right on the website.

The data is processed based on your consent (Art. 6 Sect. 1 lit. a GDPR). You may revoke any consent you have given at any time by unsubscribing from the newsletter. This shall be without prejudice to the lawfulness of any data processing transactions that have taken place prior to your revocation.

The data deposited with us for the purpose of subscribing to the newsletter will be stored by us until you unsubscribe from the newsletter or the newsletter service provider and deleted from the newsletter distribution list after you unsubscribe from the newsletter. Data stored for other purposes with us remain unaffected.

After you unsubscribe from the newsletter distribution list, your e-mail address may be stored by us or the newsletter service provider in a blacklist to prevent future mailings. The data from the blacklist is used only for this purpose and not merged with other data. This serves both your interest and our interest in complying with the legal requirements when sending newsletters (legitimate interest within the meaning of Art. 6 para. 1 lit. f GDPR). The storage in the blacklist is indefinite. **You may object to the storage if your interests outweigh our legitimate interest.**

For more details, please consult the Data Privacy Policies of MailChimp at: <https://mailchimp.com/legal/terms/>.

8. Plug-ins and Tools

Google Maps

Via an API, this website (<https://seal.games>) uses the mapping service Google Maps. The provider is Google Ireland Limited (“Google”), Gordon House, Barrow Street, Dublin 4, Ireland.

To enable the use of the Google Maps features, your IP address must be stored. As a rule, this information is transferred to one of Google’s servers in the United States, where it is archived. The operator of this website has no control over the data transfer.

We use Google Maps to present our online content in an appealing manner and to make the locations disclosed on our website easy to find. This constitutes a legitimate interest as defined in Art. 6 Sect. 1 lit. f GDPR. If a respective declaration of consent has been obtained, the data shall be processed exclusively on the basis of Art. 6 Sect. 1 lit. a GDPR. This declaration of consent may be revoked at any time.

For more information on the handling of user data, please review Google’s Data Privacy Declaration under: <https://policies.google.com/privacy?hl=en>.

Freshdesk

We use the CRM system Freshdesk to process user enquiries. The provider is Freshworks, Inc. 1250 Bayhill Drive, Suite 315, San Bruno, CA 94066, USA.

We use Freshdesk in order to process your requests quickly and efficiently. This represents a legitimate interest in the sense of Art. 6 para. 1 lit. f DSGVO.

Freshworks is certified as a US-American provider Privacy-Shield and thereby commits itself to comply with the data protection law of the EU. In addition, we have concluded a Data Processing Agreement (DPA) with Freshworks. This ensures that Freshworks uses the user

data only within the framework of the EU data protection standards exclusively for processing the requests and does not pass them on to third parties.

You can only send enquiries with your e-mail address and without giving your name.

The messages addressed to us remain with us until you request us to delete them or the purpose for data storage is no longer applicable (e.g. after completion of processing your request). Mandatory legal provisions - in particular retention periods - remain unaffected.

If you do not agree with the processing of your inquiry with us via Freshworks, you can alternatively communicate with us by e-mail, telephone or fax.

For further information, please refer to the Freshworks data protection declaration:

<https://www.freshworks.com/privacy/>

Conclusion of a contract for order processing

We have a contract with Freshworks in which we commit Freshworks to protect the data of our customers and not to pass it on to third parties.

9. eCommerce and payment service providers

Data transfer upon closing of contracts for services and digital content

We share personal data with third parties only if this is necessary in conjunction with the handling of the contract; for instance, with the financial institution tasked with the processing of payments.

Any further transfer of data shall not occur or shall only occur if you have expressly consented to the transfer. Any sharing of your data with third parties in the absence of your express consent, for instance for advertising purposes, shall not occur.

The basis for the processing of data is Art. 6 Sect. 1 lit. b GDPR, which permits the processing of data for the fulfilment of a contract or for pre-contractual actions.

PayPal

Within our games we offer payment via PayPal among others. The provider of this payment processing service is PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal, L-2449 Luxembourg (hereinafter referred to as "PayPal").

If you choose payment via PayPal, we will share the payment information you enter with PayPal.

The legal basis for the sharing of your data with PayPal is Art. 6 Sect. 1 lit. a GDPR (consent) as well as Art. 6 Sect. 1 lit. b GDPR (processing for the fulfilment of a contract). You have the option to at any time revoke your consent to the processing of your data. Such a revocation

shall not have any impact on the effectiveness of data processing transactions that occurred in the past.

Kiel, Germany 6-12-2020