



Jelly Entertainment

Privacy Policy

Contents

Contents.....	2
1. Purpose.....	3
2. What information do we collect about you and why do we do so?.....	3
3. Who do we share your information with?.....	4
4. Will we transfer your personal information outside the EEA?.....	4
5. For how long do we store your information?.....	5
6. Cookie policy.....	5
7. Your Rights.....	6
8. Security.....	7
9. Amendments.....	8
10. Clarity and Accessibility.....	8
11. Contact Us.....	8

1. Purpose

1.1. This Privacy Policy (“Policy”) sets out how we collect, process and store any information that you provide us with, including but not limited to your Personal Data (“Information”) when using services or products provided by us (“Services”) and/or when using the website jellyentertainment.com including all subpages (“Website”).

1.2. We are committed to ensuring that your privacy is consistently and effectively protected and therefore Processing of any Information by which it is possible to directly, or indirectly, identify you (“Personal Data”) is carried out only in accordance with this Policy and in strict compliance with the General Data Protection Regulation EU 2016/679 (“GDPR”) and all local laws and regulations complementing, superseding or made under it, including the guidance and codes of practice issued by any relevant supervisory authority (together “Applicable Data Protection Law”).

1.3. Any reference in this Policy to “Jelly Entertainment”, “us”, “we” or “our” shall mean Jelly Entertainment Ltd, a company incorporated under the laws of England and Wales, bearing company registration number 12737495, with a registered address at Centrum, Norwich Research Park, Norwich, NR4 7UG, England and all its subsidiaries. We refer to you, the visitor and/or customer as “you” and derivatives of the word “you”. Capitalised terms shall have the meaning as set out by Applicable Data Protection Law and this Policy.

1.4. This Policy applies where we are acting as a Data Controller with respect to the Information pertaining to Website visitors and/or Services users and outlines the purposes and means of our Processing of the Personal Data provided.

1.5. Please take some time to read and make sure you understand this Policy as well as consent to the specific Processing of your Information prior to using our Websites and/or Services.

2. What information do we collect about you and why do we do so?

2.1. Below are the primary sources from where we obtain Information about you, including Personal Data where applicable:

- The Information you provide us with in the process of signing up to, and using, our Services: This includes Personal Data such as name, surname, email address, phone number, user IDs and other types of Information such as transactional user data that you provide to us in order for us to be able to enter into a contractual relationship with you, for us to administrate and deliver the Services and for us to be able to fulfil our contractual obligations to you;
- The Information you provide us with when filling a form on our Website: This would include Personal Data such as name, surname, email address, phone number, curriculum vitae, etc. This Information is obtained through voluntary submission to our system and may be Processed for the purposes of answering your queries on our Website and/or Services, managing job applications, operating our Website, providing our Services, ensuring the security of our Website and Services, maintaining back-ups of our databases and communicating with you. The legal basis for this Processing is your explicit consent;
- The Information we obtain from your use of our Website: This includes which games you are interested in, which content you view, search enquiries, your dynamic IP address, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your use of our Websites and/or Services. This usage data may be Processed for the purposes of analysing the use of the website and services. The legal basis for this Processing is our legitimate interest in monitoring and improving our website and services;

- **Cookies:** These are small files with several characters sent to your device when you access the Website and/or use our Services. Please refer to the section related to cookies below in this Policy for detailed information on the cookies we use and how to opt-out from them;
- **Records:** We may keep correspondence from you to us for record-keeping purposes and/or process your Information set out herein in order to satisfy our legal obligations, or where we have a legitimate reason for doing so in accordance with this Policy.

2.2. We may process any of your Information identified in this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this Processing is the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3. Who do we share your information with?

3.1. We may share your Information collected through the use of our Services and/or our Website with other Data Controllers and/or Data Processors as outlined below:

- We may disclose your Information to any member of our group of companies (this means our subsidiaries/sister companies, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal basis, set out in this Policy;
- We may disclose and share your Information to Data Processors engaged by us for providing services related to the administration of our Services and/or Website. In instances where we use a Data Processor for Processing your Information, a binding Data Processing Agreement has been entered between us, the Data Controller, and the Data Processor to ensure that all Processing of your Information is undertaken only for specific purposes and always in accordance with the GDPR;
- We may disclose your Information to our professional advisers so long as it is reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure;
- In addition to the specific disclosures identified in this section, we may disclose your Information where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your Information where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4. Will we transfer your personal information outside the EEA?

4.1. As a general rule, the Information we Process about you will be stored and Processed within the European Union (EU)/European Economic Area (EEA) or any other non-EEA country deemed by the European Commission to offer an adequate level of protection. Nonetheless, in some cases, it may be necessary for us to transfer your Information to a non-EEA country not considered by the European Commission to offer an adequate level of protection. In such cases, apart from all appropriate safeguards that we already implement to protect your Information, we have in place additional adequate measures such as ensuring that the recipient is bound by the EU Standard Contractual Clauses (the EU Model Clauses) designed to protect your personal information as though it were an intra-EEA transfer.

5. For how long do we store your information?

5.1. We ensure that any of your Information that we Process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We may retain your Information where such retention is necessary to comply with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also keep derivatives of your Information for business analytics purposes where no automated decision-making is involved.

6. Cookie policy

6.1. We use cookies and similar technologies to help us understand how people use our Website and/or Services so that we can keep improving them.

6.2. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

6.3. Cookies do not typically contain any information classified as Personal Data, but Personal Data that we store about you may be linked to the information stored in and obtained from cookies.

6.4. We use the following cookies for the following purposes:

- CookieDisclaimerAccepted: to store your consent to and your preferences in relation to the use of cookies more generally.

6.5. In addition to our own cookies, we work with various reputable companies to help us analyse how the Websites and/or the Services are used, and to optimise our Website and Services to deliver the best possible experience.

We use Google Analytics to analyse the use of our Website and Services. Google Analytics gains information about websites' use through cookies. The information gathered relating to our Website and/or Services is used to create reports about the use of our Website and/or Services.

The Google analytics cookies we use are the following:

- `_ga`
- `_gid`
- `_gat`

Further information may be found here:

(<https://support.google.com/analytics/answer/6004245>), including a link to Google's privacy policy (<https://policies.google.com/privacy?hl=en>).

6.6. Browsers usually allow you to refuse to accept cookies and to delete cookies. The possibility to do so depends on the browser, and its version. However, obtaining up-to-date information regarding blocking and deleting cookies can be done through the following links:

- <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- <https://support.microsoft.com/en-us/microsoft-edge/delete-cookies-in-microsoft-edge-63947406-40ac-c3b8-57b9-2a946a29ae09> (Edge);

- <https://support.apple.com/kb/PH21411> (Safari).

Please note that blocking all cookies will have a negative impact upon the usability of many websites and if you block cookies, you will not be able to use all the features on our Website and/or Services.

6.7. We have done and will continue doing our best to provide you with clear and comprehensive information about our use of cookies. If you choose to use the Website and/or our Services without blocking or disabling cookies or opting out of these technologies (as described above), you will indicate your consent to our use of these cookies and to our use (in accordance with this Policy) of any Personal Data that we collect using these technologies.

6.8. If you do not consent to the use of these technologies, please be sure to block or disable them using your browser settings, the opt-out links above, or the settings on your mobile device.

7. Your Rights

7.1. In this Section, we provide an overview of the principal rights that you are afforded under Applicable Data Protection Law. These rights are subject to restrictions and exceptions as stipulated in Applicable Data Protection Law and as such, this list serves as an illustrative example and is not intended to be exhaustive. Please refer to Applicable Data Protection Law and regulatory authorities for guidance and a complete explanation of these rights and their related scope.

7.2. Your principal rights under Data Protection Law are:

- the right to be informed;
- the right to access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;
- the right to data portability;
- rights related to automated decision-making including profiling.

I. Right to be Informed: You have the right to be informed about the collection and use of your Personal Data. We are providing detailed information about the purposes, methods and means of our processing of your Personal Data in our privacy policy and in relation to the specific activities where we collect your Personal Data, e.g., consent forms, e-mails, etc.

II. Right to Access: You have the right to confirmation as to whether or not we Process your Personal Data and, where we do, access to the Personal Data, together with some additional information. That additional information includes details of the purposes of the Processing, the categories of Personal Data concerned and the recipients of the Personal Data. We will supply to you a copy of your Personal Data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

III. Right to Rectification: Should your Personal Data be inaccurate you have the right to rectification and, taking into account the purposes of the Processing, to have any incomplete Personal Data about you properly completed.

IV. Right to Erasure: In some circumstances you have the right to the erasure of your Personal Data without undue delay. Those circumstances include situations where: Personal Data is no longer necessary in relation to the purposes for which they were collected or otherwise Processed; you withdraw consent to consent-based Processing; you object to the Processing under certain rules of Applicable Data Protection Laws; the Processing is for direct marketing purposes; and the Personal Data has been unlawfully Processed.

That said, please be aware that general exclusions might apply, including but not limited to, where Processing is necessary for compliance with a legal obligation or the establishment, exercise or defence of legal claims.

V. Right to Restriction: In some circumstances you can exercise the right to restrict the Processing of your Personal Data. Those circumstances include but are not limited to: Processing when unlawful but you oppose erasure; when we no longer need the Personal Data for the purposes of our Processing, but you ask for Personal Data for the establishment, exercise or defence of legal claims; and you have objected to Processing, pending the verification of that objection.

Where Processing has been restricted on this basis, we may continue to store your Personal Data. However, we will only otherwise Process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

VI. Right to Object: You have the right to object to our Processing of your Personal Data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to Process your Personal Data for this purpose.

VII. Right to Data Portability: To the extent that the legal basis for our processing of your personal information is:

- consent; or
- that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your Personal Data from us in a structured, commonly used and machine-readable format so long as it does not affect the rights and freedoms of others.

VIII. Rights Related to Automated Decision-making Including Profiling: You have the right to object, in certain cases, to processing by means of automated decision-making including profiling.

You may exercise any of your rights in relation to your Personal Data by sending an e-mail to: legal@jellyentertainment.com

Please include the following information in your email:

- Your name, and surname;
- Your relationship with Jelly Entertainment (i.e., if you are a B2B client, a player, etc.);
- The right being exercised and requested.

8. Security

8.1. We employ security measures to protect your Information from access by unauthorised persons and to prevent unlawful Processing, accidental loss, destruction and damage. We make use of state-of-the-art security mechanisms, including encryption when transferring sensitive information, including Personal Data, across the internet.

8.2. Unfortunately, we are not in a position to make any guarantees related to the security of any Information disclosed through your internet connection. Therefore, you accept the intrinsic security implications using the internet and Jelly Entertainment will accept no liability for any direct, consequential, incidental, indirect, or punitive losses or damages arising out of such an occurrence.

9. Amendments

9.1. We may update this Policy from time to time by publishing a new version on our Website. You should check this page periodically to ensure you are comfortable with any changes to this Policy.

10. Clarity and Accessibility

10.1. We are committed to ensuring that our privacy policy is clear and accessible. If you have any questions or require further clarification about any part of this policy, please contact us at: dpo@jellyentertainment.com.

11. Contact Us

11.1. If you have any queries or requests in respect of this Policy, please don't hesitate to contact us by email at: dpo@jellyentertainment.com.

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