

## Privacy policy of Torgue Limited

Welcome to the Torgue Limited privacy policy. This policy describes how Torgue and its third party advertising partners collect, use, process and share information about you.

This notice sets out what we do with your personal information, what we do to keep it secure, from where and how we collect it, as well as your rights in relation to the personal information we hold about you.

This privacy policy applies to all of our applications, games, websites, marketing, advertising activities and other services whether they are viewed, downloaded, installed or used on mobile devices, PCs or other platforms such as Facebook. In this privacy policy we refer to our applications, games, websites, marketing and advertising activities and other services collectively as our "services".

By downloading, accessing or interacting with our websites or other services, you agree to the collection and use of your information in accordance with this privacy policy. , including consenting to Torgue and our advertising partners' use of your data for targeted advertising purposes as described in the Marketing and Advertising sections of this privacy policy.

Those sections also explain how you can withhold or withdraw your consent to the use of your data for targeted advertising purposes. If you have any other concerns about providing information to us or it being used as described in this privacy policy you should not use our services.

Torgue is the controller for the personal information processed and is responsible for your personal information unless otherwise stated.

You can contact Torgue by email at [inbox@torgue.com](mailto:inbox@torgue.com)

This policy applies if you interact through our mobile applications or websites including:

- <https://torgue.com>
- <https://mcpe.mobi/>
- [Everything for Minecraft PE](#)
- [Maps for Minecraft PE](#)
- [Skins for Minecraft PE](#)

### Data we collect and use:

We collect your user details including your email address and display name from your Google account when you sign in. This is to allow us to identify users of the applications and helps us to be able to exert your rights e.g. update your account with the correct details or to delete your account when you are no longer using it. When you log in using your Google account details, we will receive some of your Google account information. Exactly what information we receive will depend on your settings in your Google account, but typically we will receive your basic public profile information such as your name, email address and profile picture.

You can revoke future access to your information at any time by following the steps at <https://support.google.com/accounts/answer/112802?hl=en>.

We would recommend that you read Google's Privacy Policy (<https://www.google.com/policies/privacy/>) and review your privacy settings from time to time to make sure that you understand fully how your Google data is shared.

We collect account details you make available to us so we can improve your experience with our websites and applications. This includes details such as your username, the users you follow and are followed by. Please remember that maps and skins uploaded are visible to all users so please do not share your personal data such as email addresses, phone numbers, etc within this content.

We may collect and analyse the content you view and interact with to help us personalise our experience for you and other users. Where possible and appropriate, we will attempt to anonymise this data to preserve your privacy. This includes information such as the maps and skins you download, like and submit.

We collect analytics and crash reporting to help improve the experience of our services for you and other users. To do this, we collect the details of what you have viewed, how long this was viewed for, the actions taken e.g. the installation of a map or a like and the details of the error. We analyse and use the information that we collect on an anonymised or aggregated basis for product development, to analyse the performance, to troubleshoot and to improve and optimise our services. For operation and maintenance purposes, our services and any third-party services may collect files that record interactions (System logs) and other Personal Data, such as the IP addresses.

If you contact us, we may keep a record of that correspondence. We use your information, including data that you provide directly to us in communications, to provide you with help and support. We will use your data to manage your account and relationship with us and improve your experience when you use our services.

Our partners may collect your data for analytics, advertising and data aggregation purposes. Details about our partners and the data they collect can be found below in the third party section.

## **Sharing**

In addition to the other disclosures described in this privacy policy, we will also share your information:

- Where we have your consent to do so (including as set out in this privacy policy);
- Where it is necessary to carry out your instructions (for example, to process a payment instruction we must provide your personal information to our payment processors);
- Where your data is in an anonymous and aggregated format, meaning you could not be personally identified from it;
- As we reasonably believe is permitted by law or regulation or as is necessary to comply with any legal obligation, or in order to enforce or apply our terms and conditions and/or any other agreement with you; or to protect the rights, property, or safety of Torgue, our users, or others.

## **Third parties**

We do use a number of third parties to process your personal information on our behalf and some of them are based outside of the European Economic Area. We would suggest you read each of our third party privacy policies carefully and feel free to contact us [inbox@torgue.com](mailto:inbox@torgue.com) or them directly with any queries.

To make sure our advertising and marketing is relevant and interesting to you, we use third-party advertising and technology companies to assist in providing advertising when you visit or use our services. This includes third party technology companies who collect data about you in order to build a profile based on your preferences and activities when you visit or use our services.

These companies automatically collect data from users when you use our services to help us identify that advertising that is shown to you and what you do after seeing this. These companies also provide us with valuable insight and information about the usage and the effectiveness of any advertising campaigns run within our services. A list of the third party advertising and technology companies that we use is outlined below with a link to each of their privacy policies. Please note that our partners operate under their own privacy policies and we would advise you to read these:

- [AdColony](#)
- [AdMob](#)
- [Altamob](#)
- [Amadoad](#)
- [Amazon](#)
- [AppGrowth](#)
- [AppLovin](#)
- [Appreciate](#)
- [AppTV](#)
- [Axonix](#)
- [Beeline](#)
- [Bidease](#)
- [Bucksense](#)
- [Chartboost](#)
- [Clickky](#)
- [Edge226](#)
- [Fabric](#)
- [Firebase](#)
- [Flurry](#)
- [Fractional media](#)
- [Fyber \(Formerly Inneractive\)](#)
- [Get loyal](#)
- [Google](#)
- [GroundTruth](#)
- [Hybrid](#)
- [HyperadX](#)
- [Index Exchange](#)
- [InMobi](#)
- [IronSource](#)
- [LiquidM](#)
- [Manage.com](#)
- [Mintegral](#)
- [MoPub](#)
- [MyTarget](#)
- [Ogury](#)
- [OpenX](#)
- [Opera](#)
- [Persona.ly](#)
- [PubNative](#)

- [Smaato](#)
- [StartApp](#)
- [Tapcore](#)
- [Tapjoy](#)
- [Unity Ads](#)
- [Vungle](#)
- [Yandex](#)

These third party advertising companies collect, store and use data by integrating cookies and other tracking software on our services. The relevant data collected by these third parties includes:

- Data about your device, location and use of our services, including IP address, a unique device ID, geo-location details and your User ID that we have assigned to you;
- Data which you provide to us when using our services, including information on your interaction with advertising, service usage and certain technical information.

These third party advertising companies will collect and use your data to provide you with targeted advertising that is relevant to you and your preferences with your consent. You can control and withdraw your consent to this targeted advertising at any time on our services. If you do not provide or withdraw your consent to receive targeted advertising that is relevant to you and your preferences, then we will still serve you advertising when you visit or use our services but this will no longer be tailored to you or your preferences.

In some cases these third parties will also use the data that they collect for their own purposes, for example they may aggregate your data with other data they hold and use this to inform advertising related services provided to other clients.

We might also share your data with social media or other similar platforms, as well as our advertising partners, so that you and other people can see relevant advertising on that platform. For example, we may use the Facebook Custom Audiences service and share your IDFA with Facebook so that we can serve relevant advertising to you or include you in a custom audience that we will serve relevant advertising to you on Facebook; or create an audience of other Facebook users based on the information in your Facebook profile. You can opt-out from Facebook Custom Audiences in your Facebook privacy settings, for example, and other similar platforms may have equivalent opt-out settings.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

### **Other third parties**

We will share your personal information with the following third parties or categories of third parties:

- The OS providers of your device, or the providers of the platform from which you viewed or downloaded our services, in order to verify purchases you make and provide in-app purchase opportunities. This includes Google, Amazon and Apple;
- Google, Inc. (trading as Fabric), who provide analytics of bugs and issues with our services, so that we can fix, stabilise and improve our services;
- We will also disclose your personal information to third parties:
  - where it is in our legitimate interests to do so to run, grow and develop our business

- if we or any of our group companies sell or buy any business or assets (or propose to do so), or we or any of our group companies are or may be acquired, we or our group companies may disclose your personal information to the prospective seller or buyer of such business or assets, and to their legal, financial and other professional advisers, and that personal information may be one of the transferred assets
- if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, any lawful request from government or law enforcement officials and as may be required to meet national security or law enforcement requirements or prevent illegal activity
- in order to establish, exercise, enforce, or defend our terms of service or any other agreement or to respond to any claims, to protect our rights or the rights of a third party, to protect the safety of any person or to prevent any illegal activity

We may disclose and use anonymised, aggregated reporting and statistics about users of our services for the purpose of internal reporting or reporting to our group or other third parties. None of these anonymised, aggregated reports or statistics will enable our users to be personally identified.

We have outlined the way we use your data above and we will never share, sell or rent any of your personal information to any third party without notifying you and, where necessary, obtaining your consent. If you have given your consent for us to use your personal information in a particular way, but later change your mind, please contact us [inbox@torgue.com](mailto:inbox@torgue.com) and we will ensure this permission is removed.

#### **Using our services**

By downloading, accessing or using our services, you consent to the collection of information about you by us. Most of this data comes directly from you or your device, such as device information e.g. tablet or phone, country and region, and service usage information.

We use this data to provide our services to you, including for the purposes of optimisation and customising offers.

#### **Cookies**

Our services make use of cookies to help provide certain features. You can restrict or block the use of cookies using settings on your device.

Ad identifiers, cookies and similar technologies are used by us to provide our services to you and in order to collect data from your device. These technologies allow us and our third-party advertising partners to:

- recognise you and your device;
- provide interest-based advertising to you;
- allow us to understand how you interact with our websites (for example, where we use cookies such as the Google Analytics cookie on our Websites);
- allow our payment processors to process your payment instructions; and
- enable us and third parties to provide you with more customised services, for example to provide our services in the correct language.

When you purchase items via our mobile apps (such as those you can purchase in the App Store, on Facebook or on Google Play) we do not collect or store any payment information from you.

We may also share your information with third party publishers who develop and provide other services to you on our behalf.

You can choose to prevent your device's ad identifier being used for interest-based advertising, or you can reset your device's ad identifier, by changing the settings of your device. Settings vary from device to device, but you will usually find the ad identifier settings under "privacy" or "ads" in your device's settings.

Please note that adjusting your preferences as described in this section does not mean you will no longer receive adverts, it only means the adverts you do see will be less relevant to your interests. We will also still use your device's ad identifier to serve you with ads; for example, we may use this for frequency capping (in other words, to control the maximum number of times you see the same ad from us).

You can opt-out of Google Analytics cookie use at any time by following the instructions [here](#).

### **Analytics and Research**

We use analytics tools, which may include third party analytics tools, to collect information about how you use of applications. Those tools may use cookies or other similar tracking technologies. We may use your data to carry out research, surveys or to engage directly with you, for example by sending you communications (including by email), for these purposes. We may also create reports, analysis or similar services for use by us for the purposes of research or business intelligence, for example to track potential problems or trends with our services, or to test out new features and content.

### **Social and Community**

We use Twitter as a communication tool to create conversation with our players. If you choose to interact with those channels, we will receive your information and use it in connection with those channels, including to engage with you, and we may also republish your posts to those channels.

### **Cheating, crime and fraud prevention**

We may use personal data that we hold to prevent cheating, crime or fraud. We may also need to pass your information to fraud prevention agencies and other organisations involved in crime and fraud prevention, such as the police.

### **Legal uses**

We may use your data as required or permitted by any applicable law. As a specific example, if you live in the European Union, this would include for the purpose of providing VAT invoices where we are required to do so by law or where requested by you.

### **Your rights**

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

### **Withdraw consent**

Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data. If you wish to withdraw your consent, you must discontinue use of our services, delete our services from your devices and revoke any permissions you have granted our services on other platform such as Facebook. You must also contact to inform us that you no longer consent to your data being processed as outlined in this privacy policy. Please contact us via email using [inbox@torgue.com](mailto:inbox@torgue.com).

**Data deletion.**

In some circumstances you have a right to have some of the personal information that we hold about you deleted. Should you wish to have any information about you deleted, please contact us via [inbox@torgue.com](mailto:inbox@torgue.com). Please note that in order to process your request you must discontinue use of our services, delete our services from your devices and revoke any permissions you have granted our services on other platform such as Facebook. Where we delete personal information about you, we may still retain some or all of that information for other purposes such as maintaining financial records, protecting or enforcing legal rights, maintaining marketing suppression lists or for technical reasons such as maintaining technical security or our database integrity. We may also retain your information in an anonymised form. In some instances, personal information about you that is visible through app usage such as usernames may be cached on other users' devices and we may not be able to remove or update that data from those devices, for example if that device is not connected to a wifi network.

**Object to processing of your Data**

Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.

**Right of access**

You have a right to know what information we hold about you and, in some cases, to have the information communicated to you. If you wish to exercise this right, please contact us letting us know that you wish to exercise your right of access and what information in particular you would like to receive. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information. Please note that we may not be able to provide all the information you ask for, for instance if the information includes personal information about another person. Where we are not able to provide you with information that you have asked for, we will endeavour to tell you why. We will try to respond to any request for a right of access as soon as possible, but we will always do so within 1 month of receipt of your request and verification of your identity.

**Verify and seek rectification**

Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected. We try to keep the information that we hold about you accurate and up-to-date. If you find your information is incorrect, please contact us via [inbox@torgue.com](mailto:inbox@torgue.com)

**Restrict the processing of your Data**

Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

**Have their Personal Data deleted or otherwise removed**

Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.

**Account deactivation**

If you have created an account with us, you can ask us to deactivate that account by contacting us using the information below. We may ask you for other information before we are able to deactivate your account. That information might include information about your mobile device.

**Data portability**

In some circumstances, you may have the right to request that data which you have provided to us is provided to you, so you can transfer this to another data controller. Receive their Data and have it transferred to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.

### **Lodge a complaint**

Users have the right to bring a claim before their competent data protection authority.

### **Direct marketing opt out**

If you have elected to receive direct marketing communications from us, you can change your mind at any time by following the opt out link in any marketing communication that is sent to you. If you have elected to receive more than one type of marketing communications from us, you may need to opt out of all of them individually. It may take a few days for us to update our records before any opt out is effective.

Please contact us at [inbox@torgue.com](mailto:inbox@torgue.com) if you wish to make a request.

There are other ways in which you can control the personal information that we collect about you. For instance, you could disconnect your Facebook or other social network account or delete our services from your mobile device. You could also reset your mobile advertising identifier or limit ad tracking altogether using the settings in your phone. Finally, you could limit or prevent the use of cookies in your web browsers.

### **Children**

You must be over 18 to use our services, depending on where you live. If you believe that we might have any information from or about a child under the age of 18, please email us [inbox@torgue.com](mailto:inbox@torgue.com). In the event that we learn that we have collected personal information from a child under the relevant age set out above, we will delete that information as quickly as possible.

### **Security**

Torgue takes appropriate security and technical measures to protect your information from unauthorised access, loss and misuse. In addition, we request that our suppliers who process personal information on our behalf take a range of security measures designed to help protect your personal information and maintain an appropriate level of security. However, we cannot guarantee the absolute security of your information online and offline, as the Internet by its nature is not a secure environment and the nature of security risks is constantly evolving. As such you should always take care when sharing your information online.

### **Legal Bases**

In each case where we process your information, we do so lawfully in accordance with one of the legal basis set out under European data protection law. The legal bases which we rely upon are the following:

- **Contractual Necessity** This covers data used by us in order to provide you with services that you have requested - and that we have agreed - to provide to you, such as our services and third party social network connectivity;
- **Legal Obligation** This covers data used by us to comply with a legal obligation, such as to maintain records relating to tax or to respond to a valid legal request for certain data;

- **Legitimate Interests** This covers data used by us for purposes that are not harmful to your privacy and can be reasonably expected within the context of your use of our services, such as Marketing, Advertising, analytics, research and optimisation of our other services.

### **Consent**

This is used as a legal basis in the following contexts: (i) the collection of data stored on your device by us and our advertising partners, including device information, ad identifiers, IP address, country and region. You consent to this collection when you agree to view, download or install our services and you can withdraw your consent as described above. By accessing and using our services, you consent to this storage and you can withdraw your consent by updating your cookie settings; and (ii) the use of your data by us and our partners for targeted advertising purposes (for more information, see Marketing and Advertising above). You consent to this collection when you accept this privacy policy and you can withdraw your consent to this processing by following the steps at How to adjust your preferences for interest based advertising. Where we ask for your consent to use your data for any other purpose, we will make this clear at the point of collection and we will also make clear how you can withdraw your consent.

In this privacy policy we have explained how you can opt out of certain types of processing that we undertake and where any processing is based on your consent, you can withdraw that consent at any time in the ways described in this privacy policy.

### **Retention**

We will keep your information for as long as your account is active or we consider necessary for the purposes described in our privacy policy. We will also retain and use your information for as long as is required in order to comply with our legal obligations. If your account remains inactive for six months we will send you a notification of our intention to remove your account. If there is still no sign-in after 12 months we will attempt to anonymise the account by removing any associated person details.

### **Location of storage**

We store your information on servers largely based outside the EEA in order to process and store your information to provide our services to you.

### **International Transfer**

We may transfer your information to affiliated entities or third parties to jurisdictions outside the EEA. Please note that these countries outside of the EEA may not have the same data protection laws as your own jurisdiction. We take steps to ensure that there are adequate safeguards and mechanisms in place (including the use of EU model clauses) to allow the transfer of your information across borders outside of the EEA.

### **Keeping your data secure**

We understand that the best way for us to keep your data secure is for us to collect as little data as we can so where appropriate we will minimise how much data we collect about you. On top of this, where possible and appropriate we will attempt to encrypt your data at rest and in transit so it cannot be accessed by unauthorised parties. We will also attempt to use access control to prevent unauthorised access.

**We will not share your information with any third parties for the purposes of direct marketing.**

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## **Definitions**

### **Personal Data (or Data):**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

### **Usage Data:**

Information collected automatically through this Application (or third-party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

### **User:**

The individual using this Application who, unless otherwise specified, coincides with the Data Subject.

### **Data Subject:**

The natural person to whom the Personal Data refers.

### **Data Processor (or Data Supervisor):**

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller, as described in this privacy policy.

### **Data Controller (or Owner):**

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

### **This Application:**

The means by which the Personal Data of the User is collected and processed.

### **Service:**

The service provided by our applications and websites.

### **European Union (or EU):**

Unless otherwise specified, all references made within this document to the European Union include all current member states to the European Union and the European Economic Area.

### **Cookies:**

Small piece of data stored in the User's device.

**Changes to this privacy policy**

We keep our privacy notice under regular review to make sure it is up to date and accurate.

The Owner reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User's consent, the Owner shall collect new consent from the User, where required.