

Proyoli Gaming Ltd. (the “**Company**” or “**Proyoli**”)

Privacy Policy

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## **Introduction**

Proyoli Gaming Ltd. (the “**Company**” or “**We**” or “**Our**”) appreciates and respects your privacy. This Privacy Policy explains what information is collected by us when you enter and use our [Site](#), and/or play the ‘Real Manager’ game, including any localized version under sub-domains of our Site (collectively the “**Services**” or the “**Games**”) and how and why we collect the information we do. It also explains how we may use this data, and what rights you have in relation to such.

In general, we collect personal information directly from you or if you subscribe through a social media provider, such as Apple, Facebook or using your Google Account via your social media provider.

If you are aged 16 or under (a minor), or you are reading this on behalf of a minor for whom you have parental responsibility, please refer to the Section on [Minors and Privacy](#).

Any capitalized terms not defined herein shall be as set forth in the [Terms of Use, terms](#).

PLEASE READ THIS PRIVACY POLICY CAREFULLY. IF YOU DO NOT WISH FOR YOUR INFORMATION TO BE USED AS SET FORTH HEREIN, PLEASE DO NOT ACCESS THE SITE OR USE THE SERVICE.

## **WHAT INFORMATION WE COLLECT & HOW WE COLLECT IT**

**If you register at our site using an e-mail, we collect the following information:**

- First Name and Last Name: this can be your real name or an alias.
- E-mail: this is used for authentication
- Date of Birth: this is so we can verify you are above 16. In-game purchases are subject to parental supervision if you are a minor. You must provide us with the information for parental control across the application.
- Favorite Team: we need this in order to provide you with content related to your favorite team. This is an essential component of the Game and can only be deleted when deleting the account. This information can be seen by other fans of the same team and might be passed to the team itself.
- Country of Residence.
- Content of Communications: We will collect your communications with us, such as emails, customer service requests, survey responses, or social media posts or messages.

We may also request the following information:

- Location data

**If you register using your Apple, Facebook or Google account (“Social ID”):**

If you register using your Social ID (or link to your Social ID at a later stage), we use your Social ID for authentication purposes, and you may consent to us receiving your e-mail, name, date of birth and location. We may also receive information regarding your gender, and the IDs of your friends. In addition, your Social ID profile picture might appear in social features if your account is linked to your Social ID. The transfer of such information and any additional information to us is under the terms of your Social ID account. We encourage you to review the privacy policies for the social media platforms and authentication methods you use.

When you correspond with us, we collect your name and e-mail address, and any other information we might need in order to conduct the dialogue with you.

We will use your IP address for analysis purposes e.g. to see how you were directed to our site.

### **When Playing the Game**

When you play the Game, we automatically collect and store information about your interaction in server logs (“**Logs**”) that we maintain in order to enable us to analyze your performance over several seasons. This may include details of how you are using our Services; device event information such as crashes, system activity, hardware settings, browser type, standard HTTP request headers, including but not limited to user agent, referral URL, language preference, date and time, and cookies that may uniquely identify your browser or your user account (“**Other Data**”). Your name, contact information and password are not stored in the Logs.

Device Details and Network Information: Some devices share and our servers may log information such as type of device, hardware model, MAC Address, OS, version, settings, configuration, and network-related information such as IP address, mobile network provider

Digital Activity: When you connect to our online services, we may collect information about online activity and usage patterns, such as access times, webpages visited, web logs, app features used, etc.

Device and Mobile Location: Depending on your device and app settings, we may also collect location data from your devices when you use our apps or online services.

You may use app or device controls to prevent certain types of automatic data collection. But if you choose not to provide or allow information that is necessary for certain products or features, those products or features may not be available or function correctly.

## **WHAT DO WE DO WITH THIS INFORMATION?**

Your e-mail or any other identifier (such as Apple, Facebook or Google ID) is used first and foremost for authentication purposes. We use your personal data in order to recognize you and create a unique identifier and unique user experience for you.

Your first and last name (or alias) are made public in the Game leader boards and may also be published on social media. Your first and last name can be an alias.

We use your country of residence to determine the privacy policy relevant to you and default language.

We keep a record of your communication with us in order to help us resolve issues and to safeguard you and the Site against fraud and abuse. We also keep a record of all consents you provide.

We may correspond with you using your e-mail and occasionally send you a newsletter. You may opt-out of this at any time using the link provided within each email or on the My Account page.

In the event of a merger, acquisition or asset sale we may disclose your personal information to the prospective seller or buyer.

The Other Data we collect also helps in understanding and improving how you use the Site including carrying out analytics; in protecting and securing the Site; forwarding payments for processing; complying with applicable laws and regulations; and other business-related purposes, managing records, and conducting legal, regulatory and internal investigations.

**Joint Marketing Partners: We may share personal information with partners with which we offer co-branded services or engage in joint marketing activities.**

#### **Clubs, Sports Administrations and Sponsors.**

We may share your personal data with sports clubs, sports administration organizations and sponsors, for payment in cash or in kind.

#### **In App Purchases**

If you make in-Game purchases using a payment processor, we keep your payment processor ID and details regarding your purchases for our internal records. We use Paypal, Google Pay and Apple Pay as payment processors. When paying, using any of the foregoing payment processors, you are subject to their privacy policy. You can find the terms and conditions of each of the foregoing as follows:

Paypal's privacy statement can be found [here](#).

Google Payments privacy notice can be found [here](#).

Information about Apple pay's security and privacy can be found [here](#)

From time to time we may ask you to participate in certain surveys. If you consent to participate in a survey the information you provide will be used in order to improve our game and to further personalize your experience and as set forth elsewhere in this document. .

In addition, we may offer access to certain third-party services such as Pollfish and Admob.

#### **Minors**

It is important to us that children can enjoy our Services in a responsible manner.

We are committed to safeguarding children's personal data collected online, and to helping parents and guardians and their children learn how to exercise control over personal data while exploring the Internet.

We will not knowingly sell Personal Information of minors over the age of 13 but less than 16 years of age, unless they provide us with affirmative authorization.

We will not knowingly sell Personal Information of minors of age 13 and under without parental or guardian's consent.

## **Information security & retention**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. The support team or anyone representing the product, will never ask for your password.

## **Third Party Services**

We engage third party businesses to provide services to us or to you on our behalf, such as support for the internal operations of our Services (and related services), and this may include communications, data storage and customer support. In providing their services, they may access, receive, maintain or otherwise use personal data on our behalf. Our service providers are only permitted to use your personal data in accordance with the relevant services and are not permitted to use your personal data for their own purposes. Where this is not the case you will be notified by us.

We also use third party tools to help us manage and analyze our social media presence, and report on comments, mentions and other content that is posted about us on social media sites and other public channels and forums. These third parties' activities, and their information collection and sharing practices, are subject to the terms of the relevant social media site, channel or forum.

We use a third-party service, Google Analytics, to collect information such as details of visitor behavior patterns. This information is aggregated and used to analyze and maximize the experience our users have in each part of the Services. This information is only used by us in a way which does not identify you.

## **Links to Other Sites**

The Services contain links to other websites, applications and environments that are not owned or controlled by us (the “**Other Sites**”) such as Pollfish and video ads by Admob. The owners and operators of those Other Sites are responsible for their collection or use of your personal data and you should check their respective privacy policies. Unless specifically referred to otherwise, this Privacy Policy applies to the Services only and not the Other Sites.

## **Pollfish**

Upon receipt of your specific consent, by clicking on the “I agree” button that pops up the first time you are offered to participate in a Pollfish survey, Pollfish cookies will be enabled for you. Thereafter, when you are connected to our Site, Pollfish will detect whether you are eligible for another survey. Data collected by Pollfish will be associated with you and as such deemed personal information. For a full list of data received by Pollfish through this website, please read carefully Pollfish respondent terms located at <https://www.pollfish.com/terms/respondent>. Upon clicking on the aforementioned “I agree” button you have given explicit consent for the placement of a Pollfish cookie in your system and the processing by Pollfish of the aforementioned data. You may disable Pollfish operation at any time by using the Pollfish “opt out section” available on Pollfish website or by disabling “third party cookies” from your browser’s settings.

## **Admob**

If you decide to view a Google Admob video ad, you hereby acknowledge that you are aware that your user data may be collected, shared and used by Google as set forth in Admob Privacy Policy which can be found

[here](#) and more information about how Google uses information from sites or apps that use its services can be found [here](#). You can find information about how you can control the information collected by Google on these sites and apps [here](#).

### **Security of Personal Information**

Safeguarding personal information is important to us. While no systems, applications, or websites are 100% secure, we take reasonable and appropriate steps to help protect personal information from unauthorized access, use, disclosure, alteration, and destruction.

Except for Proyoli's employees and service providers, who are under an explicit obligation to maintain confidentiality, we may share your information with any competent law enforcement authority, if required to do by a judicial order or any other legal directive.

We may use professional security services in order to safeguard the collected information. Such services may include periodical checks and backups. Nevertheless, we are not responsible for any security faults that may be caused and are beyond our control.

We are putting in to place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed (a Data Security Breach). In addition, we limit access to your personal data to those employees, contractors and other third parties who have a business need to know. They will only use your personal data on our instructions, and they are subject to a duty of confidentiality.

We are putting into place procedures to deal with any suspected Data Security Breach and will notify you and any applicable regulator where we are legally required to do so.

To help us protect personal information, we request that you use a strong password and never share your password with anyone or use the same password with other sites or accounts.

### **Location of Personal Information**

The personal information we collect may be stored and processed in your country or region, or in any other country where we or our affiliates, subsidiaries, or service providers maintain facilities. The storage location(s) are chosen to operate efficiently and improve performance. We take steps designed to ensure that the data we collect is processed according to the provisions of this Privacy Policy and applicable law wherever the data is located.

Currently, your personal data is processed on our cloud which is hosted by Amazon and processed using MongoDB Atlas in various locations around the world, including in the USA, which attest that they are Privacy Shield certified.

### **Cookies and Similar Technologies**

Our websites and online services use cookies and similar technologies to operate and to help collect data. Cookies are small text files placed on your device to store data that can be recalled by a web server in the same domain that placed the cookie. The text in a cookie often consists of a string of numbers and letters that uniquely identifies your device, but it can contain other information as well.

Cookies on our websites are used to store your preferences and settings, enable you to sign-in, combat fraud, analyze how our products perform, could provide interest-based advertising and fulfill other legitimate purposes.

Our websites may also contain electronic images known as web beacons (also called single-pixel gifs) that we use to help deliver cookies on our websites, count users who have visited those websites, and gather usage and performance data. We also include web beacons in our promotional email messages or newsletters to determine whether you open and act on them, and in our ads appearing on other sites to measure the performance of those ads.

Our websites often include web beacons and cookies from third-party service providers. In some cases, that is because we have hired the third party to provide services on our behalf, such as site analytics or advertising. In other cases, it is because our web pages contain third-party content (such as embedded videos, maps, plug-ins, or ads) that contain web beacons used to determine the effectiveness and track your interaction with that content. When your browser connects to a third party's web server to retrieve content and/or web beacons, that third party is able to set or read its own cookies on your device and may collect information about your online activities over time and across different websites or online services that also contain that third party's content or web beacons.

For example, our Site may use Amplitude, a third-party analytics tool, to track page content and click/touch, movement, scroll, and keystroke activity.

We also use Google Analytics and other Google services to support the operation of our websites. To learn about how Google uses and shares data it collects through these services, we encourage you to visit <https://www.google.com/privacy.html> and <https://www.google.com/policies/privacy/partners/>. You can also opt out of being tracked by Google Analytics across all websites. To find out how you can opt out, please visit <http://tools.google.com/dlpage/gaoptout>.

Most browsers will also enable you to disable third party cookies. You may also choose to delete cookies stored in your device at any time. However please note that if you set your browser to reject any or all cookies and/or deleted them, you may not be able use the Site and any or all of the features or Services.

## **Changes**

Any changes we may make to our Privacy Policy in the future will be posted on our web site. If we make substantial changes to this Privacy Policy, we will inform you by an email or by placing a notification window on our website

## **Contact Us**

If you have any questions, or need further information about our privacy practices, please get in touch using our [support@real-manager.club](mailto:support@real-manager.club). Using this page allows us to respond to your query as quickly and efficiently as possible.