

# COOKIES POLICY

## Cookies Policy:

WHAT ARE THE LEGAL BASIS FOR PROCESSING PERSONAL DATA? .....	2
IMPORTANT TERMS.....	2
WHO DOES THIS COOKIE POLICY APPLY TO?.....	3
WHO IS THE CONTROLLER? .....	3
CONTACT DETAILS TO THE CONTROLLER.....	3
DATA PROTECTION OFFICER.....	3
WHO IS THE SUPERVISORY AUTHORITY? .....	3
WHAT TYPES OF COOKIES ARE USED? .....	4
OPERATIONAL, TECHNICAL AND OPTIMIZATION COOKIES.....	4
THE USE OF ANALYTICAL, PROFILING, TRACKING COOKIES AND SCRIPTS .....	4
THE USE OF ANALYTICAL, PROFILING AND TRACKING THIRD PARTY COOKIES .....	5
THIRD PARTY COOKIES.....	6
HOW TO MANAGE COOKIES? .....	7
TRANSFERRING PERSONAL DATA TO A THIRD COUNTRY (I.E. OUTSIDE THE EEA).....	7
DISCLOSURE OF PERSONAL DATA .....	8
IMPLEMENTATION OF THE RIGHTS OF DATA SUBJECTS.....	8
INFORMATION ABOUT JOINT CONTROLLERS.....	9
DATA PROTECTION IMPACT ASSESSMENT (I.E. DPIA).....	10

## What are the legal basis for processing personal data?

The rules on the protection of personal data (hereinafter referred to as the GDPR<sup>1</sup>) are set out, inter alia, in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance) and country related special acts (lex specialis).

### Important terms

1. "**Personal data**" - means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person,
2. "**Cookies**" - a cookie is a small text file that the website saves on the user's computer or mobile device when browsing the website,
3. "**Website**" - website provided at the link <https://souldanceparty.com/#home> or other websites provided by the Controller,
4. "**Processing**" - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction,
5. "**Controller**" - means 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; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law,
6. "**Joint controller(s)**" - Joint controller(s) occurs when at least two Controllers jointly determine the purposes and means of processing, they are Joint controllers (art. 26 GDPR),
7. "**Third party**" - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data,
8. "**Supervisory authority**" - means an independent public authority which is established by a Member State,
9. "**Consent**" - the consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or

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<sup>1</sup> GDPR: <https://uodo.gov.pl/en/514>

by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her,

10. **"Profiling"** - means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements,
11. **"Cookies Policy"** - information on the use of cookies on the website run by the Controller. The cookie policy is available on the Controller's website. Cookies may belong to the Controller or to third parties,
12. **"GDPR"** - Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (General Data Protection Regulation): <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=celex%3A32016R0679>

### **Who does this Cookie Policy apply to?**

This Cookie Policy (hereinafter CP) concerns the processing of personal data of natural persons, website users, collected using cookies on the website or subpages belonging to the Controller.

### **Who is the Controller?**

Please be advised that Controller is 1C SPD Sp. z o.o., Krakowiaków 36 Str., 02-255 Warsaw, Poland, KRS: 753542.

### **Contact details to the Controller**

Please send inquiries regarding the protection of personal data to the Controller by traditional mail to the above-mentioned address or by e-mail to the address: iod\_1csdp@1ce.games.

### **Data Protection Officer**

Please be advised that the Controller has not appointed a Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address: iod\_1csdp@1ce.games.

### **Who is the supervisory authority?**

We would like to inform you about the right to lodge a complaint to the supervisory body, President of the Personal Data Protection Office, contact to the supervisory body is available at: <https://uodo.gov.pl/en/484>.

### **What types of cookies are used?**

The following types of cookies are or may be used on the website and subpages of the Controller's website:

- 1) technical, operational, optimizing navigation and display of content posted on the website,
- 2) analytical, profiling, tracking,
- 3) scripts and third party cookies,
- 4) cookies of other websites.

### **Operational, technical and optimization cookies**

Please be advised that the Controller uses the operational, technical and optimization cookies described below on the website. Please be advised that in the case of the following cookies, the legal basis for the processing of personal data is Art. 6 (1) f) GDPR - processing is necessary for the purposes of the legitimate interests pursued by the controller. Please be noted that the actions described below are considered as the legitimate interest of the Controller:

No.	The name of the cookie	Description	Validity period
1.	PHPSESSID	System cookie, binds client and server session	Active for one session
2.	cookie_success	Stores the status of accepting cookies	1 year
3.	lang_id	System cookie, contain language of portal	1 year
4.	rmb_code_login	System cookie, contain status for remember user auth	1 year

### **The use of analytical, profiling, tracking cookies and scripts**

Please be advised that the Controller uses the analytical, profiling and tracking cookies and scripts described below on the website. Please be advised that in the case of the following cookies, the legal basis for the processing of personal data is Art. 6 (1) a) GDPR - consent of the data subject. Please be advised that consent is voluntary, and failure to do so will mean that cookies will not be used for the purposes for which they were provided. Withdrawal of the consent granted for analytical, profiling and tracking cookies is carried out by deleting them in the web browser:

No.	The name of the cookie	Description	Validity period
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1.	Cookies starting with _ym & _ym_d & _ym_uid	Yandex Metrics is being created <a href="https://yandex.com/legal/confidential/?lang=en">https://yandex.com/legal/confidential/?lang=en</a>	Active for one session or up to 1 day
2.	_ga & _gid & _gat	The id is assigned by google analytic <a href="https://policies.google.com/terms?hl=en&amp;gl=be">https://policies.google.com/terms?hl=en&amp;gl=be</a>	Active for one session or up to 1 day
3.	1cgames-pixel	Defining the user's browser	Installed by the browser (from 3 months to ~)
4.	rpt_code	ID for Internal Analytics	Up to 3 months
5.	consent_id & xsollauid & first_visit & corpsite_visit & SnapABugHistory & locale & intercom-id	xsolla payment system <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	1 day - 1 year
6.	VISITOR_INFO1_LIVE & CONSENT & GPS & PREF	YouTube <a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	1 day - 1 year
7.	Cookies starting with _ym & _ym_d & _ym_uid	Yandex Metrics is being created <a href="https://yandex.com/legal/confidential/?lang=en">https://yandex.com/legal/confidential/?lang=en</a>	Active for one session or up to 1 day

### The use of analytical, profiling and tracking third party cookies

Please be advised that the Controller uses the analytical, profiling and tracking third party cookies described below on the website. Please be advised that in the case of the following cookies, the legal basis for the processing of personal data is Art. 6 (1) a) GDPR - consent of the data subject. Please be advised that consent is voluntary, and failure to do so will mean that cookies will not be used for the purposes for which they were provided. Withdrawal of the consent granted for analytical, profiling and tracking cookies is carried out by deleting them in the web browser:

No.	The name of the cookie	External site	Description	Validity period
1.	consent_id	xsolla cookie	Used for GDPR consent <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	18 days
2.	xsollauid	xsolla cookie	This cookie contains a unique user ID. It allows to group actions made on website or application by one person and analyze the service's usability <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	10 year

3.	Cookies starting with_ym	xsolla cookie	Yandex Metrics is being created <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	Active for one session or up to 1 day
4.	_ga & _gid & _gat	xsolla cookie	The id is assigned by google analytic <a href="https://policies.google.com/terms?hl=en&amp;gl=be">https://policies.google.com/terms?hl=en&amp;gl=be</a>	Active for one session or up to 1 day
5.	first_visit	xsolla cookie	This cookie contains the name of the first visited product <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	1 year
6.	corpsite_visit	xsolla cookie	This cookie contains the flag of the corporate site visit <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	1 year
7.	SnapABugHistory	xsolla cookie	Used for correct operation of the customer support chat in Pay Station <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	1 year
8.	locale	xsolla cookie	User localization <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	1 year
9.	intercom-id	xsolla cookie	This cookie contains an ID of the Intercom session <a href="https://xsolla.com/cookie">https://xsolla.com/cookie</a>	1 week
10.	VISITOR_INFO1_LIVE	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	6 months
11.	CONSENT	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	17 year
12.	GPS	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	Active for one session or up to 1 day
13.	PREF	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	2 year

### Third party cookies

On some webpages or subpages belonging to the Controller, cookies from other parties may be used, and content from external entities, such as Facebook, YouTube, LinkedIn, Twitter, may also be displayed. To view third party content, you must first agree to their specific terms and conditions. Part of these conditions is the cookie policy, over which the Controller has no control and is not responsible for the processing of personal data collected via cookies of these websites:

No.	Third party name	Link to information
1.	Facebook	<a href="https://www.facebook.com/legal/terms">https://www.facebook.com/legal/terms</a>
2.	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>
3.	LinkedIn	<a href="https://www.linkedin.com/legal/user-agreement">https://www.linkedin.com/legal/user-agreement</a>
4.	Twitter	<a href="https://twitter.com/en/tos#intlTerms">https://twitter.com/en/tos#intlTerms</a>
5.	Google Maps	<a href="https://www.google.com/intl/en_be/help/terms_maps/">https://www.google.com/intl/en_be/help/terms_maps/</a>
6.	VK	<a href="https://connect.vk.com/privacy">https://connect.vk.com/privacy</a>

### How to manage cookies?

Cookies can be managed freely and can be deleted. Individual browsers or devices may offer settings that allow you to choose whether browser cookies are to be set and also to delete them. These settings vary from browser to browser, and manufacturers can change both the settings they provide and the way they work at any time. Additional information on the settings offered by individual browsers can be found on the pages under the following links:

No.	Browser name	Link to information
1.	Google Chrome	<a href="https://support.google.com/chrome/answer/95647">https://support.google.com/chrome/answer/95647</a>
2.	Internet Explorer	<a href="https://support.microsoft.com/en-ie/help/17442/windows-internet-explorer-delete-manage-cookies">https://support.microsoft.com/en-ie/help/17442/windows-internet-explorer-delete-manage-cookies</a>
3.	Firefox	<a href="https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&amp;redirectlocale=en-US">https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&amp;redirectlocale=en-US</a>
4.	Safari	<a href="https://support.apple.com/en-ie/guide/safari/sfri11471/mac">https://support.apple.com/en-ie/guide/safari/sfri11471/mac</a>
5.	Opera	<a href="https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/">https://blogs.opera.com/news/2015/08/how-to-manage-cookies-in-opera/</a>

### Transferring personal data to a third country (i.e. outside the EEA)

1. Please be informed that due to the use of cookies on the website, personal data processed via cookies may be transferred to a third country, i.e. outside the EEA. In the case of transfer of personal data outside the European Economic Area,
2. Please be advised that the transfer of personal data outside the EEA may involve the risk of not ensuring sufficient security of personal data,
3. List of entities that may transfer personal data outside the EEA, which may not ensure sufficient protection of personal data provided for in the GDPR:

No.	Name of the entity	Link to information	Possible negative consequences for the data subject
1.	Facebook	<a href="https://www.facebook.com/legal/terms">https://www.facebook.com/legal/terms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR,

			4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
2.	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
3.	Google	<a href="https://policies.google.com/terms?hl=en&amp;gl=be">https://policies.google.com/terms?hl=en&amp;gl=be</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
4.	LinkedIn	<a href="https://www.linkedin.com/legal/user-agreement">https://www.linkedin.com/legal/user-agreement</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
5.	Twitter	<a href="https://twitter.com/en/tos#intlTerms">https://twitter.com/en/tos#intlTerms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,
6.	Google Maps	<a href="https://www.google.com/intl/en_be/help/terms_maps/">https://www.google.com/intl/en_be/help/terms_maps/</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects,

### Disclosure of personal data

Please be advised that personal data is disclosed to data recipients. The categories of recipients are entities that provide marketing services, advertising agencies, marketing agencies with which the Controller has concluded Data Processing Agreement based on art. 28 GDPR. The list of entities to which personal data is entrusted is available at the request of the data subject.

### Implementation of the rights of data subjects



We would like to inform you about the right to request the Controller to exercise the following rights:

- 1) the right to access personal data relating to the data subject,
- 2) the right to rectify personal data,
- 3) the right to delete personal data (erasure of personal data),
- 4) the right to limit the processing of personal data (restriction of processing),
- 5) the right to object to the processing,
- 6) the right to transfer data (the right to data portability),
- 7) the right to receive a copy of your personal data,
- 8) the right to lodge a complaint with the supervisory body.

Please be advised that due to the individual purposes of processing listed in this Cookie Policy, the exercise of the rights of data subjects may be fully or partially limited, e.g. due to applicable law, which obliges the Controller to process them. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address: [iod\\_1csdp@1ce.games](mailto:iod_1csdp@1ce.games).

### **Information about Joint controllers**

1. 1. Please be advised that the Controller, as part of cooperation with business partners, may run a fanpage on social media through them, including on Facebook (hereinafter FB) fanpage (<https://www.facebook.com/1COnlineGames>).
2. Please be advised that in connection with running a fanpage on FB as part of cooperation with business partners, there is co-administration (Article 26 of the GDPR). The Joint controllers with regard to personal data processed on the fanpage are or may be:
  - 1) 1C SDP Sp. z o.o.,
  - 2) 1C Online Games Limited,
  - 3) Facebook Ireland Limited, with its registered office at 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland,
3. Please be advised that the Joint controllers made common arrangements. Information on co-administration and responsibilities is available at: [https://www.facebook.com/legal/controller\\_addendum](https://www.facebook.com/legal/controller_addendum)
4. Please be advised that regardless of the arrangements made between the Joint controllers, the data subject may exercise his rights under the GDPR with respect to each of the data, Controllers separately,
5. Contact details to the Data Protection Officer:
  - 1) please be informed that the Controller 1C SDP Sp. z o.o. did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address [iod\\_1csdp@1ce.games](mailto:iod_1csdp@1ce.games),
  - 2) please be informed that the Controller 1C Online Games Limited did not appoint the Data Protection Officer. Inquiries regarding the protection of personal data should be

directed to the Controller by traditional mail to the Controller's address or by e-mail to the following address [iod\\_1cog@1ce.games](mailto:iod_1cog@1ce.games),

- 3) contact details to the Data Protection Officer on behalf of Facebook Ireland Limited are available at: <https://www.facebook.com/privacy/explanation>.
6. We hereby inform that due to the co-administration, the supervisory authorities competent for the Controllers are:
  - 1) For 1C SDP Sp. z o. o. - President of the Personal Data Protection OfficeOffice of the Commissioner for Personal Data Protection, contact to the supervisory body is available at: <https://uodo.gov.pl/en/484>,
  - 2) for 1C Online Games Limited – Office of the Commissioner for Personal Data Protection, contact to the supervisory body is available at: [http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact\\_en/contact\\_en?opendocument](http://www.dataprotection.gov.cy/dataprotection/dataprotection.nsf/contact_en/contact_en?opendocument),
  - 3) for Facebook Ireland Limited - Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland: <https://www.dataprotection.ie/>.

#### Data Protection Impact Assessment (i.e. DPIA)

1. If a given type of processing - in particular with the use of new technologies - due to its nature, scope, context and purposes, is likely to result in a high risk of violating the rights or freedoms of natural persons, the Controller, prior to processing, shall assess the effects of the planned processing operations for the protection of personal data,
2. Please be informed that that due to the use of analytical, profiling and cookies on the website, personal data processed through the above-mentioned cookies may be transferred to a third country, i.e. outside the EEA. In the event of transfer of personal data outside the European Economic Area, a given country may not provide sufficient protection of personal data, may not ensure the implementation of rights under the GDPR, personal data protection may be violated. Please be advised that the transfer of personal data outside the EEA may involve a high risk of not ensuring sufficient security for the personal data being processed,
3. List of entities that may transfer personal data outside the EEA, which may not ensure sufficient protection of personal data provided for in the GDPR:

No.	Name of the entity	Link to information	Possible negative consequences for the data subject - the risk related to the transfer of personal data outside the EEA
1.	Facebook	<a href="https://www.facebook.com/legal/terms">https://www.facebook.com/legal/terms</a>	1) unauthorized access to data, 2) loss of control over your data, 3) no possibility of exercising the rights under the GDPR, 4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects

2.	YouTube	<a href="https://www.youtube.com/t/terms">https://www.youtube.com/t/terms</a>	<p>1) unauthorized access to data,  2) loss of control over your data,  3) no possibility of exercising the rights under the GDPR,  4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects</p>
3.	Google	<a href="https://policies.google.com/terms?hl=en&amp;gl=be">https://policies.google.com/terms?hl=en&amp;gl=be</a>	<p>1) unauthorized access to data,  2) loss of control over your data,  3) no possibility of exercising the rights under the GDPR,  4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects</p>
4.	LinkedIn	<a href="https://www.linkedin.com/legal/user-agreement">https://www.linkedin.com/legal/user-agreement</a>	<p>1) unauthorized access to data,  2) loss of control over your data,  3) no possibility of exercising the rights under the GDPR,  4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects</p>
5.	Twitter	<a href="https://twitter.com/en/tos#intlTerms">https://twitter.com/en/tos#intlTerms</a>	<p>1) unauthorized access to data,  2) loss of control over your data,  3) no possibility of exercising the rights under the GDPR,  4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects</p>
6.	Google Maps	<a href="https://www.google.com/intl/en_be/help/terms_maps/">https://www.google.com/intl/en_be/help/terms_maps/</a>	<p>1) unauthorized access to data,  2) loss of control over your data,  3) no possibility of exercising the rights under the GDPR,  4) other, negative effects indicated in recital (75) of the preamble to the GDPR: material and non-material effects</p>