

Ledendal Games Data Protection Notice

Introduction

- 1 This data protection notice explains how Ledendal Games AB process personal data on its website (ledendalgames.se, ledendalgames.com), hereafter called “our website”.
- 2 We mainly use our website to market our products and to give our customers technical support and further information about our products.
- 3 When this notice refers to “GDPR” it means the European Union Regulation 2016/679 (the General Data Protection Regulation). You can find the text of the Regulation [here](#).
- 4 When this notice refers to the “data subject” it means the identified or identifiable natural person (human) whose personal data is being processed (e.g., someone visiting our website).

Who is responsible for the processing of personal data?

- 5 Ledendal Games AB is the controller for the processing of personal data on our website. Contact us by using dataprivacy@ledendalgames.se to exercise your rights under the GDPR (see below para. 23 et seq).

How do you process personal data on your website?

- 6 We collect and further process personal data on our website for the following purposes.

Responding to web browser requests

- 7 When someone visits our website their web browser sends a request to our web server using the Hypertext Transfer Protocol (HTTP). HTTP is the standard protocol for communication on the world wide web.
- 8 The HTTP request sent by a web browser contains data that can make it possible to identify the user (e.g., the IP address that is used to connect a computer or other device to the internet).

- 9 We process the HTTP request data to respond to your request and send the requested web page content to your device. Once the request has been handled by our server the data is deleted with the exception for data that is retained for cybersecurity purposes (as explained below para. 12 et seq).
- 10 The processing of personal data in response to a web server request by a web browser is based on Article 6(1)(f) of the GDPR (legitimate interest). We have a legitimate interest in marketing our products and providing technical support and other information about our products to our customers or other persons visiting our website.
- 11 Data subjects have the right to object to processing of personal data concerning him or her when the processing is based on the legitimate interest of the controller (Article 6(1)(f) of the GDPR). See below paras. 35-37, for how to contact us to object to further processing of your personal data.

Information and network security (cybersecurity)

- 12 When someone visits our website, we collect and retain certain HTTP request data (see above para. 7 et seq) and data generated by our server in response to that request for cybersecurity purposes.
- 13 Such data includes the IP address that is used to establish the connection to the website.
- 14 The data is retained as part of our webserver's access log. Logs are regularly deleted 30 days after the data has been collected.
- 15 Data collected for cybersecurity purposes can, however, be retained for longer periods when necessary for the investigation of and response to a security breach or suspected security breach. In such an event, the personal data is deleted when it is no longer needed for the investigation, security measures or for the establishment, exercise or defence of related legal claims.
- 16 The processing of personal data for cyber security purposes is based on Article 6(1)(f) of the GDPR (legitimate interest). We have a legitimate interest in protecting our website, systems and data from cybersecurity threats.

- 17 Data subjects have the right to object to processing of personal data concerning him or her when the processing is based on the legitimate interest of the controller (Article 6(1)(f) of the GDPR). See below paras. 35-37, for how to contact us to object to further processing of your personal data.
- 18 The processing of personal data for cyber security purposes is also based on Article 6(1)(c) of the GDPR (legal obligation). We have an obligation under the GDPR to protect the personal data of our customers and other persons (data subjects) visiting our website (Article 32 of the GDPR). Data subjects do not have a right to object to the processing of their personal data when based on such a legal obligation laid down in law (see below para. 36).

Who are we sharing personal data with?

- 19 We are as a general policy not sharing personal data collected from our website with any third parties.
- 20 When necessary for the investigation or response to a security breach we can share personal data collected and retained for cybersecurity purposes (see above para. 12 et seq) with outside legal counsel, cybersecurity experts, law enforcement authorities or other competent public authorities. Sharing of personal data with such competent authorities is sometimes mandated by law.
- 21 We are using a web hosting company established in the EU to host our website. Our web host is processing HTTP request data and storing it on our behalf as outlined above (see para. 6 et seq).
- 22 We are using **YouTube** to host videos that are embedded on our website using YouTube Privacy-Enhanced Mode. This means that third-party cookies are not set until you actively play the video. **Notice that embedded YouTube videos set cookies and transmit data to YouTube (Google) servers.** For more information see our Cookie Policy which can be found on our website.

What rights do you as a data subject have?

Right of access by the data subject

- 23 Data subjects have the right to request confirmation from the controller whether or not his or her personal data is being processed (Article 15(1) of the GDPR).
- 24 Where that is the case the data subject also has the right to obtain certain additional information about the processing of his or her data as specified in Article 15(1) points (a) to (h) of the GDPR.
- 25 The data subject also has the right to obtain a copy of his or her personal data undergoing processing by the controller (Article 15(3) of the GDPR). Such a copy is free of charge, but the controller can charge a reasonable fee based on administrative costs for further copies.
- 26 You can contact us by using dataprivacy@ledendalgames.se to get confirmation and additional information about our processing of your personal data. You can also request a copy of your personal data.
- 27 We can deny your access request to the extent that it adversely affects the rights and freedoms of others (e.g. other data subjects), our trade secrets or intellectual property.

Right to rectification

- 28 Data subjects have the right to rectification of inaccurate personal data concerning him or her (Article 16 of the GDPR). The data subject also has the right to the right to have incomplete personal data completed.
- 29 You can contact us by using dataprivacy@ledendalgames.se to have incorrect or incomplete personal data rectified.

Right to erasure ('right to be forgotten')

- 30 Data subjects have the right to erasure of personal data concerning him or her in the situations specified in Article 17(1) points (a) to (f) of the GDPR.
- 31 Notice that data subjects do not have an absolute right to have their personal data erased. A request can, for example, be denied when the

retention of the personal data is mandated by law or for the establishment, exercise or defence of legal claims (Article 17(3) of the GDPR).

- 32 You can contact us by using dataprivacy@ledendalgames.se to have your personal data erased. You need to specify the reasons for why the data should be erased (Article 17(1) points (a) to (f) of the GDPR).

Right to restriction of processing

- 33 Data subjects have the right to request that personal data concerning him or her is restricted (Article 18 of the GDPR), which means that the data can only be stored or otherwise processed for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest without the data subject's consent.
- 34 You can contact us by using dataprivacy@ledendalgames.se to have your personal data marked as restricted. You need to specify the reasons for why the data should be restricted (Article 18(1) points (a) to (d) of the GDPR). You have the right to be informed before the restriction is lifted.

Right to object

- 35 Data subjects have the right to object to the processing of their personal data (Article 21 of the GDPR). On such a request the controller shall stop processing the personal data unless the controller can demonstrate that it has compelling legitimate grounds for the continued processing which overrides the interests of the data subject.
- 36 This right is limited to personal data that was collected and further processed based on Article 6(1)(e) (public interest) or Article 6(1)(f) (legitimate interest) of the GDPR.
- 37 You can contact us by using dataprivacy@ledendalgames.se to object to the processing of your personal data. You need to specify the reasons for why the processing should not continue, unless the data is processed for direct marketing purposes.

Right to data portability

- 38 Data subjects have the right to request their personal data in a structured, commonly used and machine-readable format (Article 20 of the GDPR).
- 39 This right to data portability is limited to personal data that the he or she has provided to the controller and that was collected and further processed based on Article 6(1)(a) or Article 9(2)(a) (consent) or Article 6(1)(b) (contract) of the GDPR.
- 40 The data subject also has the right to have that data transmitted directly to another controller where technically feasible.
- 41 You can contact us by using dataprivacy@ledendalgames.se to exercise your right to data portability.
- 42 We can deny your request to the extent that it adversely affects the rights and freedoms of others (e.g. other data subjects), our trade secrets or intellectual property.

Automated individual decision-making

- 43 Data subjects have a right to not be subject to automated individual decision-making, which produces legal effects or similarly affects him or her (Article 22 of the GDPR). We are currently not using this kind of automated individual decision-making on our website.
- 44 Such decision-making is prohibited unless the data subject has given his or her explicit consent, it is necessary for entering into or the performance of a contract between the data subject and the controller, or it has been authorised by law.
- 45 You can contact us by using dataprivacy@ledendalgames.se to exercise your rights under Article 22 of the GDPR, which includes the right to obtain human intervention, to express your point of view or to contest a decision.

Right to lodge a complaint with a supervisory authority

- 46 Data subjects have the right to lodge a complaint with a national data protection supervisory authority in any of the member states of the European Union or the European Economic Area if the data subject considers that the processing of his or her personal data infringes the GDPR (Article 77 of the GDPR).
- 47 A list of all national supervisory authorities and their contact details can be found on the [European Data Protection Board's website](#).