

At Goblinsama Ltd we understand the importance of User privacy and data protection for you; we are respectable goblins, after all.

In this policy, we describe the type of personal information that we may collect from you, what we do with them, how we process them and which steps we take to protect your privacy.

## 1. RELEVANT LEGISLATION

Along with our business, this website is designed to comply with EU General Data Protection Regulation 2018 (GDPR) and the Data Protection Act (2018), with regards to data protection and User privacy.

## 2. WHO WE ARE

Goblinsama Ltd is the data controller for this website. The data controller is who decides how your personal data is processed and for what purposes. Our registered office is 3 St Davids Business Park, Dalgety Bay, Dunfermline, Fife, United Kingdom, KY11 9PF.

## 3. CONTACT DETAILS

Should you need to contact us for questions on how we treat your data or exercise your right, email us at <[info+privacy@goblinsama.com](mailto:info+privacy@goblinsama.com)>.

## 4. WHICH PERSONAL INFORMATION WE COLLECT, HOW AND WHY

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes, by emailing us at the contact details above.

### 4.1. PERSONAL INFORMATION

Personal information is any information that can be used to identify you, including your name and contact details.

The type and quantity of information we hold about you and how we use it will depend on the purpose for which you provided it.

We may process certain types of personal data about you as follows:

- Identity Data: may include your first name, last name
- Contact Data: may include your email address
- Marketing and Communications Data: may include your preferences in receiving marketing communications from us, and your communication preferences.

We will only use your personal data when legally permitted. The most common bases for using your personal data are:

- processing is necessary for the performance of a contract to which you are a party. If you fail to provide this information we may be unable to perform the contract;
- processing is necessary for the purpose of the legitimate interest pursued by us or a third party, except where your rights as a data subject override our legitimate interest;
- processing is necessary to comply a legal or regulatory obligation;
- your consent.

We may also process Aggregated Data from your personal data but this data does not reveal your identity and as such in itself is not personal data. An example of this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Data with your personal data so that you can be identified from it, then it is treated as personal data.

#### 4.2. OTHER DATA

Technical Data may include your Internet Protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.

Usage Data may include information about how you use our website, products and services.

#### 4.3. EMAIL NEWSLETTER

If you would like to subscribe to our newsletter, you will receive periodic newsletter email from us (about once or twice a month), with the latest updates about Goblinsama Ltd, our games and offers.

If you sign up for our newsletter, expressing your consent to receive our communication, we will have your email address, and it will be forwarded to MailChimp, which is our email marketing service provider.

You can unsubscribe at any time by clicking the unsubscribe link at the bottom of the newsletter.

We consider MailChimp as a third-party data processor (see Section 6).

#### 4.4. OTHER DIRECT INTERACTION

You may provide data by communicating with us by post, email or otherwise, including when you:

- ask information about services;
- send us feedback or bug reports.

All the data will be processed only to answer your queries. We may use third-party processors to process your data (Section 6) and may retain data according to this privacy policy (Section 7).

### 5. HOW WE STORE YOUR PERSONAL DATA

Your data is stored in an SQL database.

This and the website are hosted on a VPS located in the United Kingdom.

All the traffic between your browser and our server is encrypted using HTTPS protocol.

### 6. ABOUT OUR THIRD-PARTY DATA PROCESSORS

As many websites, we use some third-party service providers that process personal data on our behalf. All of these providers have been carefully selected and comply with the legislation of point 1.

Google ([privacy policy](#))

Facebook ([privacy policy](#))

MailChimp ([privacy policy](#))

These third parties are all based in the USA and are compliant with the [EU-US privacy shield](#).

Also, your personal data may be shared with parties set out below for the purposes set out in Section 4 above:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

#### 7. HOW LONG WE KEEP YOUR DATA

The information that we store won't be kept more than what is necessary for the purpose for which they have been collected. This means that data should be destroyed or erased from our system when no longer required.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Section 9.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

#### 8. DATA SECURITY AND BREACHES

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

Although we have taken all reasonable security precautions, we cannot guarantee absolute security and subsequently cannot guarantee that any transmission to or from our website is totally secure.

In addition to our online security efforts, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

In case of any data breach on our website's database or on the database of our third-party processors that results in the stealing of identifiable personal data stored, we will report it to all relevant persons and authorities within 72 hours from the recognisee of the breach.

#### 9. WHAT ARE YOUR RIGHTS?

You have the right to be informed about the processing of your personal data ('right to be informed').

You have a right to ask us to confirm whether we are processing information about you, and to request access to this information ('right of access').

If at any point you believe the information we process on you is inaccurate you can request to have it corrected or deleted ('right to rectification'). We want to ensure that your personal data are always updated: if you change them, please let us know and we will be happy to update them for you.

You have the right to ask us to erase your data and prevent processing, for example withdrawing your consent ('right to erasure').

You can ask us to restrict our processing, for example if you are unsure of the accuracy of the data we process ('right to restrict processing').

You have the right to obtain and reuse your personal data for your own purposes ('the right to data portability').

You have the right to object to the processing on legitimate interests, on the purpose of research and statistics and for direct marketing ('right to object'), unless the processing is for demonstrable compelling legitimate grounds or for establishment, exercise or defence of legal claims.

If you wish to exercise any of your right, you can contact us at the contact details in Section 3.

You have a right to report any of your concerns about our use of your data to the Information Commissioner's Office. You may do so by calling their helpline at 0303 123 1113 (from UK) or +44 1625 545 700 (from abroad).

#### 10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

#### 11. ABOUT THIS PRIVACY POLICY

This privacy policy may change from time to time in line with legislation. We won't notify you any time it is updated, but we recommend you check this page occasionally for any policy changes.