

PRIVACY POLICY

ON SOCIAL MEDIA

By using our social media accounts, you interact with us, e.g. by subscribing to a fanpage, leaving your reaction (likes, comments) or sending us a message. The information you provide about yourself may constitute personal information/data. This Privacy Policy (hereinafter referred to as **the Policy**) describes how we process personal data collected using accounts (hereinafter also referred to as **Fanpage**) in the following social networking sites (hereinafter referred to as **Social Networks or in particular Social Network**):

- FACEBOOK: <https://www.facebook.com/carrioofficial>;
- INSTAGRAM: <https://www.instagram.com/phobiagamestudio/>;
- YOUTUBE: <https://www.youtube.com/@PhobiaGameStudio>;
- TWITTER: <https://twitter.com/carrionmonster>;
- TIKTOK: <https://www.tiktok.com/@phobiagamestudio>;
- DISCORD: <https://discord.gg/phobia-game-studio>;

We process your personal data in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th 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 Regulation on the Protection of Personal Data, hereinafter referred to as **the GDPR**) and other generally applicable laws.

Personal data administrator

The administrator of personal data is the company under the name PHOBIA GAME STUDIO Sebastian Krośkiewicz sp. j. with its registered office in Warsaw (ul. Szczęśliwicka 54/331, 02-353 Warsaw, entered into the register of entrepreneurs kept by the District Court for the capital city of Warsaw in Warsaw, XII Commercial Division of the National Court Register, under the KRS number KRS 0000896610, having registered number NIP 7011030735 and REGON 388782737 (hereinafter: **the Administrator**). In all matters related to the processing of personal data, you can contact the Administrator directly by sending a message to the e-mail address marketing@phobia.games or by sending a message to the indicated the address of the Administrator's registered office above.

Contact with the Administrator in matters related to the processing of personal data:

- email: office@phobia.games;
- Administrator's postal address: PHOBIA GAME STUDIO Sebastian Krośkiewicz sp. j. with its registered office in Warsaw (Poland), Szczęśliwicka Street 54/331, 02-353 Warsaw.

Categories of persons whose data is processed and the scope of data processed

By following the Administrator's Fanpage on Social Networks or interacting with the content posted there, you are automatically included in the list of followers to whom the Administrator has access. By adding a comment to my content or in any other way interacting with the content published by the Administrator, you also leave a trace of yourself within the profile, which includes your personal data.

At any time, you can edit or delete your comments and reactions that you have left on the Administrator's Fanpage in accordance with the regulations applicable to the given operator/administrator of the social networking site. If you do not do this, they will remain visible for as long as they are available on a given Social Network. In addition, you can stop watching my profile at any time - in this case you will disappear from the list of Fanpage followers. The basis for the processing of personal data in this case is art. 6 sec. 1 lit. f) GDPR, i.e. the Administrator's legitimate interest in operating Fanpages on social networking sites.

By contacting the Administrator via Fanpage messengers contained in any given Social Network sites (e.g. Messenger), in a natural way related to this form of communication, you provide Administrator with your personal data contained in the correspondence, in particular your image and name and surname. As a rule, messages sent to the Administrator are automatically archived thanks to the tools available as part of a given Social Network and are available to the Administrator until they are deleted by you. You have access to all messages exchanged with me in a given application that you use in contacts with the Administrator. In this case, your data is processed in order to contact you, and the basis for processing is art. 6 sec. 1 letter f) GDPR, i.e. the legitimate interest of the Administrator.

The Administrator may use the advertising system available within a given Social Network, which allows to target advertisements to specific groups of recipients. This activity does not involve the processing of your personal data, because the ad settings are based on defining specific audiences, without using the personal data of specific users. Your data is processed in this case based on the legitimate interests of the Administrator, i.e. art. 6 sec. 1 letter f) GDPR.

FACEBOOK

We process data of persons who:

- have subscribed to the account by joining it, clicking the "Like" or "Follow" icon;
- posted their comment, shared it or clicked the "Like" icon under any of the posts in the account.

We process the following types of personal data:

- account identifier (usually including name or nickname);
- profile photo;

- other photos (which may also represent an image of a person);
- content of your public comments;
- data provided as part of a private conversation with Administrator;
- all other information publicly available on your profile;
- statistical data on people visiting the Fanpage available using the "Facebook Insights" function - cookies collected by Facebook by using Fanpage.

INSTAGRAM

We process data of persons who:

- have subscribed to the account by clicking the "Follow" icon,
- posted their comment on any of the posts posted in the account or reacted to posted photos.

We process the following types of personal data:

- account identifier (usually including name or nickname);
- profile photo;
- other photos (which may also represent an image of a person);
- content of your public comments;
- data provided as part of a private conversation with Administrator;
- all other information publicly available on your profile;
- statistical data on people visiting the Fanpage available using the Social Network function - cookies collected by Facebook by using Fanpage.

YOUTUBE

We process data of persons who:

- have subscribed to the account by clicking the "Subscribe" icon;
- posted a comment on any of the videos posted in the account or reacted to posted videos.

We process the following types of personal data:

- account identifier (usually containing name and surname or nickname);

- profile photo;
- content of your public comments;
- all other information publicly available on your profile;
- statistical data on people visiting the Fanpage available using the Social Network function - cookies collected by Facebook by using Fanpage.

TWITTER

We process data of persons who:

- have subscribed to the account by clicking the "Follow" icon;
- posted their comment on any of the entries in the account or reacted to published entries.

We process the following types of personal data:

- Account identifier (usually containing name and surname or nickname);
- profile photo;
- content of your public comments;
- data provided as part of a private conversation;
- all other information publicly available on your profile;
- statistical data on people visiting the Fanpage available using the Social Network function - cookies collected by Facebook by using Fanpage.

TIK TOK

We process data of persons who:

- have subscribed to the account by clicking the "Follow" icon;
- posted their comment on any of the entries in the account or reacted to published entries.

We process the following types of personal data:

- Account identifier (usually containing name and surname or nickname);
- profile photo;
- content of your public comments;

- data provided as part of a private conversation;
- all other information publicly available on your profile;
- statistical data on people visiting the Fanpage available using the Social Network function - cookies collected by Facebook by using Fanpage.

DISCORD

We process data of persons who:

- joined the Administrator server by inviting a dedicated link;
- posted a message anywhere on the Administrator server, shared a photo, link or any other content;
- reacted to messages posted by other server users.

We process the following types of personal data:

- account identifier (usually including name or nickname);
- profile photo;
- data provided as part of a private conversation;
- all other information publicly available on your profile;
- content of your public comments;
- statistical data on people visiting the Fanpage available using the Social Network function - cookies collected by Facebook by using Fanpage.

Purposes and legal basis for processing

The Administrator processes your personal data:

1. on the basis of a legitimate interest (Article 6 (1) (f) of the GDPR) consisting in:
 - maintaining an account on a given social networking site, on the terms and conditions set out by the operator/administrator of the Portal and informing via it about activity, promoting events and brands, products and services, building and maintaining contact with the Administrator's community (including supervision over content published by users) and for the purpose of communication via the available functionalities of the social network (comments, messages);
 - replying to private messages that you send to the Administrator;
 - conducting discussions with you as part of the comments under individual public posts;

- marketing consisting in informing about our services and about the Administrator by means of posts / publications that we place on our accounts, including sponsored posts / publications that are displayed to a wider group of users of social networks on which the Administrator has accounts;
 - keeping statistics (by analyzing data on the activity of users of our account) for the needs of the Administrator related to informing about activity, promoting events and brands, products and services, building and maintaining contact with the community;
 - possible determination, investigation or defense against claims by the Administrator.
2. on the basis of a separate consent to the extent and purpose specified in the content of the consent and for the time until its withdrawal (Article 6 (1) (a) of Art. 9 sec. 2 lit. a) GDPR);
 3. on the basis of statutory requirements in order to fulfill our legal obligations under the law (Article 6(1)(c) of the GDPR).

In the event that the Administrator organizes promotional campaigns using a social networking site, the rules for processing your personal data, including the purpose and legal basis of such processing, are described in the regulations of such action. Before participating in such a promotional campaign, please read its regulations, as participation in the campaign may be tantamount to consent to the processing of your personal data by the Administrator or a third party for the purposes of this campaign.

Co-administration of personal data

In the scope of personal data processing for the purposes of statistics, the Administrator, as a rule, acts as joint controllers within the meaning of Article 26 sec. 1 of the GDPR together with the operator/administrator of the social networking site that provides the statistics option. We undertake such activities as part of our legitimate interest, Article 6 sec. 1 lit. f) GDPR described above.

More information on data processing for the purposes of statistics can be found in the Privacy Policies published by individual operators/administrators of Social Networks.

Data recipients

Access to your personal data collected by the Administrator will/may have:

- our authorized personnel and entities providing services to us (including marketing services, IT and technical support services) that must have access to data to perform their duties;
- other users of the Social Network (due to the fact that information about people following the account, likes and other interactions, as well as the content of comments, posts and other information provided by users are public);

- public authorities and entities performing public tasks or acting on behalf of public authorities, to the extent and for purposes resulting from the provisions of generally applicable law;
- social network administrator/operators on the terms described in the privacy policies provided by the administrators of these portals.

Please note that the operators/administrators of Social Networks are entities separate from the Administrator responsible for the processing of data of people using Social Networks, including data concerning you. These entities process your personal data for their own purposes based on the legal grounds established by them. In particular, they may collect and process information contained in cookie files of people visiting our account, based on their own regulations for the functioning of the Social Portal. The administrator has no or very limited influence on the processing of data by the operators of Social Network sites. For this reason, it is appropriate that you familiarize yourself with the regulations of their operation and the privacy policies provided in them, which you will find here:

- Facebook: <https://www.facebook.com/about/privacy>,
- Instagram: <https://help.instagram.com/519522125107875>,
- YouTube: <https://policies.google.com/privacy?hl=pl&gl=pl#whycollect>
- Twitter: <https://twitter.com/en/privacy>
- TikTok : <https://www.tiktok.com/legal/privacy-policy-eea?lang=en>
- Discord: <https://support.discord.com/hc/pl/sections/115000344951-Polityka-prawno%C5%9Bci>

As part of the individual tools available to the Administrator on each Fanpage, Administrator has access to statistical information provided by Social Networks on the behavior of users. I analyze this information in order to optimize the accounts by the Administrator in terms of user experience and the effectiveness of the Administrator's activities. Information available to the Administrator from the operator/administrator of social networking sites is anonymized and processed in this way is not personal data.

Data transfer to third countries or international organizations and data security

The administrator does not transfer your personal data to a third country or an international organization. However, it has no influence on how the given operator/administrator of the Social Network handles your personal data. In this regard, search for the applicable information in the privacy policy published by individual operators/administrators of social networking sites on which you have accounts.

The key role in the context of securing your personal data that appears in the Administrator's accounts is, of course, played by the given operator/administrator of the Social Portal, while

the Administrator as a fan page administrator may only take very limited actions specified in the regulations of a given Social Portal.

The administrator, of course, takes the necessary steps to ensure the security of your personal data. Among other things, it analyzed the risks associated with individual processing of your data, and then implemented appropriate security and personal data protection measures. It also monitors the condition of the technical infrastructure on an ongoing basis, trains the staff, checks and verifies the procedures used, introduces the necessary improvements and modifications to better meet the obligations arising from the GDPR.

In case of any questions regarding your personal data, the Administrator will answer all questions under the contact details provided.

Data retention period

The period of data processing is related to the purposes and grounds for their processing, therefore:

- data processed on the basis of consent will be processed until the consent is withdrawn;
- data processed on the basis of statutory requirements will be processed for the time in which the law requires data storage;
- data processed on the basis of the Administrator's legitimate interest will be processed until the effective submission of an objection or the cessation of this interest, i.e.:
 - we process your data as standard until we terminate our account on the social networking site;
 - we store the personal data that we have obtained in the correspondence carried out for the duration of the service of the message sent to us;
 - we process data processed in order to establish, pursue or defend against claims for a period equal to the period of limitation of these claims.

Some data will also be stored until they are removed from the Social Network by you or the operator/administrator of a given Social Network. In particular, this may occur when you decide to delete the account or the account is deleted by the operator/administrator of the social network in accordance with the regulations or legal provisions in force on the given portal.

You have the following rights:

- the right to request access to your personal data, rectification, deletion or limitation of processing, as well as the right to transfer data;

- the right to withdraw consent to the processing of personal data, if you have previously given such consent,
- the right to object to data processing (you have the right to object to data processing on the basis of a legitimate interest; you should indicate a particular situation that, in your opinion, justifies the cessation of processing covered by the objection; the Administrator will stop processing your data for these purposes, unless I demonstrate that the grounds data processing is superior to your rights or that your data is necessary to establish, investigate or defend against any claims);
- the right to object at any time to the processing of your data for direct marketing purposes;

if the processing of your data is based on consent - the right to withdraw consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

The rules related to the exercise of the above-mentioned rights are described and regulated in detail in Art. 16-21 GDPR.

To exercise your rights, please contact us using the contact details indicated in the introduction.

You also have the right to lodge a complaint with the supervisory body – in case of Poland you should direct complaint to the President of the Office for Personal Data Protection, ul. Stawki 2, 00-193 Warsaw (<https://uodo.gov.pl/>).

Information about the data source and other information

- We receive your personal data directly from you through your interaction with our Social Media account and from your public profile;
- Providing data is voluntary, but it may be necessary to use the Administrator's accounts, in particular by interacting through them at your discretion and with the help of communication channels available on social networking sites;
- Personal data will not be subject to automated decision making, including profiling.

Date of last update of the Policy: 04/05/2023.