FEARFX SQUARED LLC

**PRIVACY POLICY**

Last Modified on \_\_\_\_\_\_\_\_\_\_\_\_\_\_

1. What’s in this Privacy Policy?

In this Privacy Policy, you’ll find:

* What information we collect about you
* How we might use that information
* What information we might share with others
* Your rights and choices about that information

1. What does this Privacy Policy cover?

We are FearFX Squared LLC. In this document, we will refer to ourselves as “FearFX Squared,” “we,” or “us.” We will refer to you and any other users as “you.”

In this Privacy Policy, we will cover the products and services that we offer to you. These include:

* The the FearFX Squared Website website located at: [[www.URL.com]].
* The Nightwell Manor video game.

Together, we’ll refer to these as the “Service.”

By using the Service, you agree to the terms of this Privacy Policy. Please read our Terms of Use, as well, for general guidance about your use of the Service. Except as otherwise expressly agreed, this Privacy Policy and our Terms of Use are the complete agreement between you and FearFX Squared.

1. What types of personal data do we collect?

Below you’ll find details about the types of personal data we collect from you and how we use it. We call this “processing” your data.

We’ll also tell you the reason for processing that data, which is known as our “legal basis.”

First, the personal data we collect from you:

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of data** | **Examples of the data** | **How we use it** | **Our legal basis** |
| Contact Information | Your Full Name and Email Address | To contact you for technical support and customer support purposes, to contact you for marketing and promotional purposes, to send surveys and gather user feedback, and to administer contests and sweepstakes. | Based on your explicit consent, under GDPR Art. 6 (1) (a). |
| Account Information | Your Username and Email Address | To create and manage your Account on the Service, to ensure your purchases are credited to your account, to contact you for technical support and customer support purposes, to contact you for marketing and promotional purposes, and to send surveys and gather user feedback. | To fulfill a contract with you, under GDPR Art. 6 (1) (b). |
| Technical Information | * Device Type * Browser Type * Hardware Model * Operating System * Other device and technical information | To analyze user activity and improve and operate the Service. | To fulfill a contract with you, under GDPR Art. 6 (1) (b). |
| Analytic Information | * IP Address * Gameplay Data * Other analytic information | To analyze user activity and improve the Service. | To fulfill a contract with you, under GDPR Art. 6 (1) (b). |
| Posts | * Chat Messages * Comments * Suggestions * Feedback | To operate public posting abilities on the Service and to gather user feedback and suggestions. | To fulfill a contract with you, under GDPR Art. 6 (1) (b). |

Next, the personal data that third parties share with us:

|  |  |  |
| --- | --- | --- |
| **What is the name of the third party sharing information with you?** | **What type of information is being shared?** | **What purpose do you use this information for?** |
| Third-party platforms (itch.io, for example) that you connect to the Service | Account Information | To connect your third-party Account to the Service | |
| Squarespace and other analytics providers | Analytic Information and Technical Information | For analytics purposes and to improve the Service | |

Finally, the personal data that we share with others:

|  |  |  |
| --- | --- | --- |
| **Our reason for sharing** | **What data is being shared?** | **Who are we sharing it with?** |
| Newsletters and user communications | Contact Information | Our mailing list provider (Mailchimp or Squarespace, for example) |
| Chat and messaging functionality | Account Information and Posts | Other Service users on our Discord and other chat/messaging platforms |

We may also need to share your personal data in a few other situations:

* To follow the law, a court order, or orders from government agencies
* To detect and combat fraud or security issues
* To protect the Service, our employees, and our business’s rights or safety

Other than that, we will not share your personal data with anyone else.

1. How long do we keep your personal data?

We only keep your personal data as long as it’s required to provide you with the Service. Sometimes a longer period might be required by law.

After that, we will delete your personal data within a reasonable time.

Please note that we may retain some data, if necessary to:

* resolve disputes,
* enforce our user agreements,
* follow any technical and legal requirements related to the Service.

1. Other Data

**“Do Not Track” Signals:** Because there’s not yet a consensus on how companies should respond to web browser-based or other “do not track” mechanisms yet, we do not respond to web browser-based do not track signals.

**Cookies:** When you use the Service, cookies may be used by us and by third parties to allow the Service to function and to help to make your user experience better.

Cookies are not spyware or adware, and can’t deliver viruses or run programs on your computer. You may configure your web browsers to accept, reject, or delete cookies, or to notify you when a cookie is being set. We may also use “pixel tags,” otherwise known as web beacons or clear gifs. These are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of website users.

For more information about our use of cookies, please see our cookie policy.

1. Children’s privacy rights

We don’t knowingly collect any personal data from children under the age of 13. We also don’t knowingly allow them to create accounts, sign up for newsletters, make purchases, or use the Service.

We may also limit our personal data processing for EU users between 13 and 16.

We take children’s privacy seriously and encourages parents to play an active role in their children’s online experience. If you have any concerns about your child’s personal data, please contact us at privacy@fearfx2.com.

1. Transfers of your personal data

Our headquarters is in the United States.

No matter where you live, by using the Service you consent to the processing and transfer of your personal data in and to the United States. This processing will be under the privacy policies of third parties that we share personal data with.

The laws of these countries governing data collection and use may not be as comprehensive or protective as the laws of the country where you live.

If you would like more information, please contact us (see “How to contact us” below).

1. EU residents’ rights

We are regulated under the General Data Protection Regulation (GDPR), which applies across the European Union (including in the United Kingdom). We are responsible as a controller of personal data for GDPR purposes.

**Your rights as an EU resident:**

Under the GDPR, EU residents have several important rights:

* You can request a copy of your personal data
* You can ask us to correct that personal data, delete it, or request that we use it only for certain purposes.
* If you’ve consented to our processing, you can change your mind and ask us to stop using your personal data. For example, you can unsubscribe from our mailing list at any time – just click the link in each marketing email.
* In some circumstances, you can ask us not to use automated processing or profiling about you.

If you would like to exercise any of those rights, please email us at privacy@fearfx2.com. We may ask for additional info to verify that you’re the owner of that data.

Also, in some cases where the law requires it, we may not be able to help with the above requests.

1. How do we protect personal data?

We have taken steps and put security measures in place to prevent the accidental loss or misuse of personal data.

For example, we limit access to those who have a genuine business need. Those processing your information will do so only in an authorized manner.

We also have procedures in place to deal with any suspected data security breach. We’ll notify you and any applicable regulator of a suspected data security breach when legally required.

1. Resolving Disputes

We hope that we can resolve any questions or concerns you raise about our use of your personal data.

Please contact us at privacy@fearfx2.com to let us know if you have questions or concerns. We will do our best to resolve the issue.

For EU residents, the GDPR also gives you right to lodge a complaint with a supervisory authority. You may do this in the EEA state where you live, work, or where any alleged infringement occurred.

1. How will we notify you of changes?

We last updated this Privacy Policy on \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.

We may make further updates from time to time. If we have your email address on file, we will inform you via email. Otherwise, we will post a message on the Service about the change.

1. How to contact us

Please contact us if you have any questions about this Privacy Policy or your personal data. You can do so by sending us an email at privacy@fearfx2.com.