

LAUNCHPAD PRIVACY POLICY

This Privacy Policy (hereinafter: the "**Policy**") contains information on the processing of your personal data in connection with the use of the "LaunchPad" Website, operating at the website address <https://www.welaunchgames.com/> (hereinafter: the "**Website**").

Personal data administrator

The administrator of your personal data is BeDigital spółka z ograniczoną odpowiedzialnością with its registered office in Krakow (registered office address: 1C Ostatnia Street, 31-444 Krakow), entered into the register of entrepreneurs of the National Court Register kept by the District Court for Krakow – Śródmieście in Krakow, XI Commercial Division of the National Court Register under KRS number: 00000687827, with TIN: 6751600206, REGON number: 367841270, having a share capital of PLN 11,050 (eleven thousand fifty zlotys) paid in full (hereinafter: "**the Administrator**").

Contact with the Administrator

In all matters related to the processing of personal data, you can contact the Administrator via: e-mail-at: daneosobowe@bedigital.pl

Personal data protection measures

The Controller applies modern organisational and technical safeguards to ensure the best possible protection of your personal data and guarantees that it processes them in accordance with the provisions of 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) (hereinafter: "**GDPR**"), the Act of 10 May 2018 on the protection of personal data and other provisions on the protection of personal data.

Information about the personal data processed

The use of the Website requires the processing of your personal data. Below you will find detailed information on the purposes and legal bases of the processing, as well as the period of processing and the obligation or voluntary provision of such data.

Purpose of processing	Personal data processed	Legal basis
Handling customer inquiries (including inquiries submitted by e-mail or through shared forms)	1) Name and surname 2) E-mail address 3) correspondence address 4) Phone number 5) other data contained in the message to the Administrator	Article 6(1)(f) of the GDPR (processing is necessary in order to pursue the legitimate interest of the Administrator, in this case to respond to the received inquiry)
Providing the above-mentioned personal data is voluntary, but necessary in order to receive an answer to the inquiry (the consequence of not providing them will be the inability to receive an answer).		

The Administrator will process the above-mentioned personal data until an objection is effectively lodged or the purpose of the processing is achieved (depending on which of the above events occurs first).

Purpose of processing	Personal data processed	Legal basis
Registration in the BeDigital Affiliate Network	<ol style="list-style-type: none"> 1) Name/Company 2) correspondence address 3) Phone number 	<p>Article 6(1)(f) of the GDPR</p> <p>(processing is necessary in order to pursue the legitimate interest of the Administrator, in this case to respond to the received inquiry)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary in order to receive a response to the inquiry (the consequence of not providing it will be the inability to register in the affiliate network).</p> <p>The Administrator will process the above-mentioned personal data until an objection is effectively lodged or the purpose of the processing is achieved (depending on which of the above events occurs first).</p>		

Purpose of processing	Personal data processed	Legal basis
Compliance with personal data protection obligations	<ol style="list-style-type: none"> 1) Name and surname 1) contact details provided by you (e-mail address; mailing address; telephone number) 	<p>Article 6(1)(c) of the GDPR</p> <p>(processing is necessary to comply with a legal obligation incumbent on the Administrator, in this case obligations arising from the provisions on personal data protection)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary for the Administrator to properly perform the obligations arising from the provisions on personal data protection, m.in. to exercise the rights granted to you by the GDPR (the consequence of not providing the above data will be the inability to properly exercise the aforementioned rights).</p> <p>The Administrator will process the above-mentioned personal data until the expiry of the limitation periods for claims due to the violation of personal data protection regulations.</p>		

Purpose of processing	Personal data processed	Legal basis
Analysis of your activity on the Website	<ol style="list-style-type: none"> 1) Date and time of visit 2) Device IP number 3) type of operating system of the device 4) Approximate location 5) Type of web browser 6) time spent on the Website 	<p>Article 6(1)(f) of the GDPR</p> <p>(processing is necessary in order to pursue the legitimate interest of the Administrator, in this case obtaining information about your activity on the Website)</p>

	7) visited subpages and other activities undertaken as part of the Website	
<p>Providing the above-mentioned personal data is voluntary, but necessary for the Administrator to obtain information about your activity on the Website (the consequence of not providing them will be the inability of the Administrator to obtain the above information).</p> <p>The Administrator will process the above-mentioned personal data until an effective objection is lodged or the purpose of processing is achieved.</p>		

Purpose of processing	Personal data processed	Legal basis
Website administration	<ol style="list-style-type: none"> 1) IP address 2) server date and time 3) About your web browser 4) Operating System Information <p>The above data is saved automatically in the so-called server logs, each time the Website is used (administering it without the use of server logs and automatic recording would not be possible).</p>	<p>Article 6(1)(f) of the GDPR</p> <p>(processing is necessary in order to pursue the legitimate interest of the Administrator, in this case to ensure the proper operation of the Website)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary to ensure the proper operation of the Website (the consequence of not providing them will be the inability to ensure the operation of the Website in a proper manner).</p> <p>The Administrator will process the above-mentioned personal data until an effective objection is lodged or the purpose of processing is achieved.</p>		

Purpose of processing	Personal data processed	Legal basis
Establishing, pursuing or defending against claims	<ol style="list-style-type: none"> 2) Name/Company 3) E-mail address 4) address of residence/registered office 5) PESEL number 6) NIP 	<p>Article 6(1)(f) of the GDPR</p> <p>(processing is necessary in order to pursue the legitimate interest of the Administrator, in this case to establish, pursue or defend against claims that may arise in connection with the performance of the Agreements concluded with the Administrator)</p>
<p>Providing the above-mentioned personal data is voluntary, but necessary in order to establish, pursue or defend against claims that may arise in connection with the performance of the Agreements concluded with the Administrator (the consequence of not providing the above data will be the inability of the Administrator to take the above actions)</p> <p>The Administrator will process the above-mentioned personal data until the expiry of the limitation periods for claims that may arise in connection with the performance of the Agreements concluded with the Administrator.</p>		

Profiling

In order to create your profile for marketing purposes and direct marketing tailored to your preferences, the Administrator will process your personal data in an automated manner, including profiling them – however, this will not cause any legal effects on you or significantly affect your situation in a similar way.

The scope of profiled personal data corresponds to the scope indicated above in relation to the analysis of your activity on the Website.

The legal basis for the processing of personal data for the above purpose is Article 6(1)(f) of the GDPR, according to which the Administrator may process personal data in order to pursue its legitimate interest, in this case to conduct marketing activities tailored to the preferences of recipients. Providing the above-mentioned personal data is voluntary, but necessary to achieve the above-mentioned purpose (the consequence of not providing them will be the inability of the Administrator to conduct marketing activities tailored to the preferences of the recipients).

The Administrator will process personal data for the purpose of profiling them until an effective objection is lodged or the purpose of processing is achieved.

Recipients of personal data

The recipients of personal data will be the following external entities cooperating with the Administrator:

- a) hosting company;
- b) companies providing tools for analysing activity on the Website and directing direct marketing to people using it (m.in. Google Analytics);
- c) a company providing accounting services;
- d) a company providing legal services.

In addition, personal data may also be transferred to public or private entities if such an obligation results from generally applicable provisions of law, a final court judgment or a final administrative decision.

Transfer of personal data to a third country

In connection with the use of the services provided by Google LLC by the Administrator, your personal data may be transferred to the following third countries: United Kingdom, Canada, USA, Chile, Brazil, Israel, Saudi Arabia, Qatar, India, China, South Korea, Japan, Singapore, Taiwan (Republic of China), Indonesia and Australia. The basis for the transfer of data to the above-mentioned third countries are:

- in the case of the United Kingdom, Canada, Israel, Japan and South Korea - decisions of the European Commission declaring an adequate level of protection of personal data in each of the above-mentioned third countries;
- for the US, Commission Implementing Decision (EU) 2023/1795 of 10 July 2023 on the basis of Regulation (EU) 2016/679 of the European Parliament and of the Council, stating the adequacy of the level of protection of personal data ensured by the EU-US data protection framework;
- for Chile, Brazil, Saudi Arabia, Qatar, India, China, Singapore, Taiwan (Republic of China), Indonesia and Australia, contractual clauses ensuring an adequate level of protection, in line with the standard contractual clauses set out in Commission Implementing Decision (EU)

2021/914 of 4 June 2021 on standard contractual clauses for transfers of personal data to third countries pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council.

You can obtain from the Controller a copy of the data transferred to a third country.

Permissions

In connection with the processing of personal data, you have the following rights:

- 1) the right to be informed about what personal data concerning you are processed by the Administrator and to receive a copy of this data (the so-called right of access). The issuance of the first copy of the data is free of charge, the Administrator may charge a fee for subsequent ones;
- 2) if the processed data becomes outdated or incomplete (or otherwise incorrect), you have the right to request its rectification;
- 3) in certain situations, you can ask the Administrator to delete your personal data, e.g. when:
 - a) the data will cease to be needed by the Administrator for the purposes of which it has informed;
 - b) you have effectively withdrawn your consent to the processing of data - unless the Controller has the right to process the data on another legal basis;
 - c) the processing is unlawful;
 - d) the necessity to delete the data results from a legal obligation incumbent on the Administrator;
- 4) in the event that personal data are processed by the Administrator on the basis of the consent granted to the processing or in order to perform the Agreement concluded with him, you have the right to transfer your data to another administrator;
- 5) in the event that personal data is processed by the Administrator on the basis of your consent to processing, you have the right to withdraw this consent at any time (withdrawal of consent does not affect the lawfulness of processing carried out on the basis of consent before its withdrawal);
- 6) if you believe that the processed personal data is incorrect, their processing is unlawful, or the Controller no longer needs certain data, you can request that for a specific, necessary period of time (e.g. checking the correctness of the data or pursuing claims) the Controller does not perform any operations on the data, but only stores it;
- 7) you have the right to object to the processing of personal data, the basis for which is the legitimate interest of the Administrator. In the event of an effective objection, the Administrator will cease to process personal data for the above purpose;
- 8) you have the right to lodge a complaint with the President of the Office for Personal Data Protection if you believe that the processing of personal data violates the provisions of the GDPR.

Cookies

1. The Administrator informs that the Website uses "cookies" installed on your end device. These are small text files that can be read by the Administrator's system, as well as by systems belonging to other entities whose services are used by the Administrator (e.g. Facebook, Google).
2. The Administrator uses cookies for the following purposes:
 - a) ensuring the proper operation of the Website – thanks to cookies, it is possible to operate the Website efficiently, use its functions and conveniently move between individual subpages;
 - b) increasing the comfort of browsing the Website – thanks to cookies, it is possible to detect errors on some subpages and constantly improve them;

- c) creating statistics – cookies are used to analyse the way users use the Website. Thanks to this, it is possible to constantly improve the Website and adapt its operation to the preferences of users;
 - d) conducting marketing activities – thanks to cookies, the Administrator can direct advertisements tailored to their preferences to users.
3. An administrator can place both permanent and temporary (session) files on your device. Session files are usually deleted when you close the browser, but closing the browser does not delete the permanent files.
 4. Information about cookies used by the Administrator is displayed in the panel located at the bottom of the Website. Depending on your decision, you can enable or disable cookies of individual categories (except for necessary cookies) and change these settings at any time.
 5. The data collected by means of cookies do not allow the Administrator to identify you.
 6. Through most commonly used browsers, you can check whether cookies have been installed on your end device, as well as delete installed cookies and block their installation by the Website in the future. However, disabling or limiting the use of cookies may cause quite serious difficulties in using the Website, e.g. in the form of a longer loading period of the Website page and restrictions on the use of certain functionalities.

Final provisions

To the extent not regulated by the Policy, generally applicable regulations on personal data protection apply.

The policy is effective from 25.05.2026 r.