



## Privacy Policy

In order to make the transparency of the information compatible with an easy understanding in the way it is presented to the users, **Synergy Games, S.L.** presents the privacy policy in two phases (multilevel or **double layer representation**), by means of this system we offer our visitors and users information about the processing of their data by means of a more summarized and concise information as a first layer of information. If more detailed information is required, a second, more extensive and detailed layer of information is available through the link:

**"[+ Information](#)".** It identifies the different aspects of the processing carried out by **Synergy Games, S.L.**

Heading	First Layer	Second layer (Link)
<b>Data controller</b>	The data processed are those strictly necessary, appropriate and relevant for each purpose. <b>Synergy Games, S.L.</b> is personal data controller.	<a href="#">+ Information</a>
<b>Purpose</b>	The purpose of the data processing carried out will be in accordance with the activities of the Departments of Synergy Games, S.L., mainly highlighting:  <b>Service as an ARPG blockchain game</b>	<a href="#">+ Information</a>
<b>Legitimization</b>	The data processing is based on the assumptions set out in Article 6 of the GDPR. In the case of Synergy Games, S.L. it is customary that such processing is carried out when the data subject has given his consent to the processing of his personal data for one or more specific purposes.	<a href="#">+ Information</a>
<b>Data retention</b>	The personal data provided will be retained for the time necessary to fulfill the purpose for which they are collected and to determine the possible liabilities that may arise from the purpose, in addition to the legal retention periods that require their conservation (Ex: Tax obligations).	<a href="#">+ Information</a>
<b>Data communication</b>	In general, personal data will not be disclosed to third parties, unless required by law: <ul style="list-style-type: none"><li>• Competent public administration</li><li>• Banks/Financial institutions</li></ul>	<a href="#">+ Information</a>

<p><b>stakeholder rights</b></p>	<p>We recognize our visitors and users to exercise their rights of access, rectification, erasure and portability of their data, of limitation and opposition to its processing, as well as not to be subject to decisions based solely on the automated processing of their data, where appropriate, before the <a href="#">Spanish Data Protection Authority</a>.</p>	<p><a href="#">+ Information</a></p>
<p><b>Additional information</b></p>	<p>This website uses its own and third-party cookies to analyze web traffic, as well as to be able to personalize the information offered to its users or to promote its services. Information to change this configuration and obtain more details about our cookies policy in the <a href="#">"Cookies Policy"</a> button.</p> <p>The website owned by Synergy Games, S.L. contains hyperlinks to other third party websites, whose privacy policies are unrelated to that of this administration. By accessing such websites you can decide whether to accept their privacy and cookie policies. In general, if you browse the Internet you can accept or reject third party cookies from the configuration options of your browser.</p>	<p><a href="#">+ "Cookies Policy"</a></p>

## Data controller

- **Company Name:** Synergy Games, S.L..
- **TAX ID:** B67934158
- **Registered Office:** Antonio Fleta St., 15 - 4 A, 50010, Zaragoza
- **Mail:** info@synergyland.world
- **Web:** www.synergyland.world

## Purpose

### a) Provision of services to existing and/or potential customers

Service as an ARPG blockchain game

To send commercial information about our products and/or services

### b) Suppliers and third parties

Outsourcing of services to third parties (companies, freelancers, foundations, associations...)

### c) Human Resources

Personnel management

Personnel file. Time control. Incompatibilities. Training. Pensi3n plans. Prevention of occupational hazards.

Issuance of personnel payroll, as well as all products derived therefrom.

Management of trade union activity (if applicable)

### d) Video surveillance

Ensure the safety of people, goods and facilities.

## Legal basis for processing

- GDPR: 6.1.a) The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- GDPR: 6.1.b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- GDPR: 6.1. c) Processing is necessary for compliance with a legal obligation to which the controller is subject;
- General Data Protection Regulation.
- The Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights.
- Law 34/2002, of July 11, 2002, on Information Society Services and Electronic Commerce (Applicable to messaging, social networks, and online sales)

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<sup>1</sup> La Commission nationale de l'informatique et des libert3s: <https://www.cnil.fr/fr/donnees-personnelles>

<sup>2</sup> Spanish Data Protection Authority (SDPA): <https://www.aepd.es/es/politica-de-privacidad-y-aviso-legal>

<sup>3</sup> Government of Aragon: <https://www.aragon.es/-/politica-de-privacidad>

\* “You have the right to withdraw the given consent at any time”

## Collectives

- a) Existing and potential customers and users
- b) Professionals and collaborators
- c) Employees and potential candidates
- d) Individuals transiting through the Entity's premises

## Categories of personal data

**Identifying information** (name, surname, NIF, postal address, telephone number, e-mail, web page)

**Other personal data** (marital status, date and place of birth, age, sex, nationality, voice, image, signature, fingerprint, iris, etc.)

**Bank data**

**Commercial information**

**Sale and purchase of goods and services**

## Categories of recipients

Customers' personal data will be communicated to the following recipients:

- Public administrations (e.g. Tax Agency; social security)
- Judicial bodies "Where applicable" (Courts)
- Financial institutions (Banks)
- Collaborating entities

## International transfers

International data transfers are not foreseen.

## Data retention period

They will be retained for the time necessary to fulfill the purpose for which they were collected and to determine any liabilities that may arise from that purpose and the processing of the data.

## Security measures

In compliance with the provisions of Article 32 of the GDPR, Synergy Games, S.L. will ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services. The level of security will be proportional to the risk in the processing of each type of personal data.

## Exercise control rights related to your data

We recognize our visitors and users their rights of access, rectification, erasure and portability of their data, and the limitation or opposition to its processing, which may be exercised in the manner provided by law at the addresses indicated above..

For more information on how to exercise your rights, the Spanish supervisory authority, the Spanish Data Protection Authority, provides you with the following link with its description and form to send the request to us: [Exercise rights](#)

For any information or questions you need to resolve about the processing of your data by Synergy Games, S.L., you can contact via the e-mail provided: [info@synergyland.world](mailto:info@synergyland.world)

## Claim (complaint) to the SDPA

If you feel, after contacting us, that your rights to your data are not being respected, you can make a complaint to the [SDPA](#).

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