

# BATTLE BIT REMASTERED

## Privacy Policy

Welcome to BattleBit Remastered. At OkiGames, we take the protection of your data very seriously. In the following, we explain what information we collect when you play BattleBit Remastered (our “Game”) and services, and how it is used.

### The Basics

#### *What law applies?*

Our use of your Personal Data is subject to both the Turkish Law No. 6698 on Protection of Personal Data has been introduced (“PDPL”) and the EU General Data Protection Regulation (“GDPR”), and of course we process your Personal Data accordingly.

#### *What is Personal Data?*

Personal Data is any information about personal or factual circumstances that relate to a person. This may include name, date of birth, email address, postal address or telephone number, but also online identifiers such as IP addresses or device IDs.

#### *What is Special Category Data?*

Special category data is Personal Data that needs more protection because it is sensitive. This includes Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data. As well as, data concerning health, a person’s sex life; and a person’s sexual orientation. In order to lawfully process Special Category Data, it is necessary to consent to the processing.

#### *What is processing?*

"Processing" is any operation or set of operations that is performed on Personal Data, whether or not it is done automatically. The term is broad and covers virtually any handling of data.

#### *Who is responsible for data processing?*

The responsible party within the meaning of the PDPL and the GDPR is OkiGames Oyun ve Yazılım Hizmetleri Limited Şirketi of 1762 Sokak 9/1 Karşıyaka/İzmir/Turkey (“ OkiGames ”, “we”, “us”, or “our”).

If you have any questions about this policy or our data protection practices, please contact us using support@joinbattlebit.com or write to us at the above address.

#### *What are the legal bases for processing?*

According to the PDPL and the GDPR, we should have at least one of the following legal bases to process your Personal Data:

- To fulfill contractual obligations  
*(The purposes of the data processing are primarily based on the service we provide).*
- In connection with our legitimate interests.  
*(Where necessary, we process your data beyond the actual performance of the contract to protect legitimate interests of us or third parties. Examples include:*
  - *Ensuring IT security and IT operations,*
  - *Corporate governance measures and further development of our services,*
  - *defense against claims by third parties and*
  - *Enforcement of our own claims).*
- Based on your consent  
*(If you have given us your consent to process Personal Data for specific purposes).*

# BATTLE BIT REMASTERED

## Privacy Policy

- To comply with legal obligations.  
(*Processing to comply with our legal obligations.*)

### Data that we collect

#### *Hosting*

To provide our Game, we use the services of [Amazon Web Services \(AWS\)](#), who process all data to be processed in connection with the operation of our Game on our behalf. The legal basis for the data processing is our legitimate interest in providing our website.

#### *Contacting us*

The processing of Personal Data depends on the nature of your contact. In addition to your name and email address, IP address or phone number, we usually collect the context of your message, which may also contain certain Personal Data. The Personal Data collected when you contact us is used to process your request, and the legal basis is your consent.

#### *When playing BattleBit Remastered*

We collect information about you when you play our game. This data may be required to enter into a contractual relationship with you or to perform a contract with you. This includes in particular our support, correspondence with you, invoicing, fulfillment of our contractual, accounting and tax obligations. Accordingly, the data is processed on the basis of fulfilling our contractual obligations as well as to fulfill our legal obligations.

We ensure that access by our employees to your data is only available on a need-to-know basis, restricted to specific individuals, and is logged and audited. We communicate our privacy and security guidelines to our employees and enforce privacy and protection safeguards strictly.

You agree that, if you have provided us with Personal Data relating to a third party you have in place all necessary appropriate consents and that such third party has read this Privacy Policy. You agree to indemnify us in relation to all and any liabilities, penalties, fines, awards, or costs arising from your non-compliance with these requirements.

You may provide us with the following Personal and Non-Personal Data:

- Nickname, SteamID64(\*), steamID, steamName, purchase history, etc.
- Device information, and records of the issues you experience to provide customer service,
- Player in-game nickname, settings, general player UI and in game interactions,
- Player to player interactions (text chat),
- Voice chats, we may, if you have given your consent to the use of our voice chat services, process your voice-related information, solely for the purpose of providing the voice chat services to you. Please note: For added security and to make our game enjoyable for everyone playing it we monitor and moderate our voice chat services.

We automatically collect the following Personal and Non-Personal Data:

- Device information (including but not limited to, IP address, network type, OS version, time zone settings, etc.),
- Device event information, including crash reports and system activity details (e.g., whether you encountered an error using our services or lost internet access, etc.)

#### *Administration, financial accounting, office organization, contact management.*

We process data in the context of administrative tasks and the organization of our business and compliance with legal obligations, such as archiving. In this context, we process the same data that we

# BATTLE BIT REMASTERED

## Privacy Policy

process in the provision of our contractual services. The processing bases are our legal obligations and our legitimate interest.

### *Information collected through third parties*

Our Game is offered on Steam by Valve Corporation P.O. Box 1688 Bellevue, WA 98009. We collect certain information from your Steam account as permitted by the terms of the Steam platform and your privacy settings on Steam. We have no influence or control over how Valve Corporation processes your Personal Data. You can find more information about data processing in Steam's [Privacy Policy](#).

Our Game is built using the game development platform [Unity](#). This uses software modules and libraries that come from Unity Technologies itself or third parties and become an inherent part of our App (called a game engine). During the execution of the app, Personal Data may be processed by Unity itself, including device identification numbers (so-called UDID - unique device identifiers, IP address). Data such as the device type, country of app installation, advertising ID, sensor markings (e.g., from the pressure or acceleration sensor), game identification number (app ID) and the checksum of the transmitted data are also processed.

Using Unity also means that the services are using "Unity Analytics". Unity Analytics collects the Personal Data such as IP addresses and device identification number (so-called UDID - unique device identifiers). Other data collected includes device specifications (device type, device language), usage data, information about in-game behavior, custom event data (where applicable).

When you play our Game, we or third parties may use cookies and similar technologies, or collect data about your machine or device, for fraud prevention, security, authentication, purposes. We may use Easy Anti-Cheat, a Technology of [Epic Games](#), [Discord](#) by Discord Inc. and ipinfo.io, a service of [IPinfo](#) within our services.

### *Third-Party and Community Servers*

To facilitate your gameplay on servers hosted by the community, your SteamID64 and username will be disclosed to third-party or community servers. Further, by connecting to such servers, you acknowledge and consent to the sharing of your IP address to support the multiplayer,online aspect of the game.

### *Social Media*

We are present on social media (currently [Discord](#), [Twitch](#), [Twitter](#), [YouTube](#) by [Google LLC](#), [Reddit](#), speedrun.com ([Elo Entertainment Inc.](#)), [kook](#) (Beijing Xiaoyaoxia Technology Co., Ltd), [TikTok](#)). If you contact or connect with us via social media platforms, we and the relevant social media platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contract.

### **Our use of Personal Information**

We may use your Personal Information for the following purposes:

- Providing you with BattleBit Remastered, our services and support, and conducting transactions you request,
- Enabling you to use BattleBit Remastered,
- Providing support to respond to your inquiries,
- Customize, analyze and optimize our solutions, services, technologies, notifications and business relationships with you,
- Better understanding our clients and users,

# BATTLE BIT REMASTERED

## Privacy Policy

- Personalizing content and implementing your preferences,
- Enforcing our terms and conditions, and separate contracts (if any) with you,
- Prevention of fraud, cheating and other prohibited or unlawful activities,
- Open communities (online gaming sessions and social networking services), tournaments or online game events participation, if any.
- Improve our Services and BattleBit Remastered,
- Protecting the security and integrity of BattleBit Remastered, our businesses, and services; and
- Other functions and purposes disclosed to you at the time of collection or as required or permitted by law.

### General Principles

#### *Who receives my information?*

Within OkiGames, those who have access to your information are those who need it to fulfill our contractual and legal obligations.

Processors used by us may also receive data for these purposes. These are companies in the areas of IT services, telecommunications, and sales and marketing. If we use processors to provide our services, we take appropriate legal precautions and corresponding technical and organizational measures to ensure the protection of Personal Data in accordance with the relevant legal provisions.

Data is only passed on to third parties within the framework of the legal provisions. We only pass on user data to third parties if this is necessary, for example, for contractual purposes or due to legitimate interests in the economic and effective operation of our company, or if you have consented to the transfer of data.

#### *How long will my data be stored?*

To the extent necessary, we process and store your Personal Data for the duration of our business relationship, which includes, for example, the initiation and execution of a contract. In addition, we are subject to various retention and documentation obligations, which result, among other things, from the statutory minimum retention periods and other retention periods prescribed in this sense, e.g. retention periods under tax or commercial law. Depending on the document and the legal regulation, the periods specified there for storage and documentation are five to ten years.

#### *How do we secure your data?*

We have taken numerous security measures ("technical and organizational measures"), such as encryption or access only when necessary, to ensure the most complete protection of Personal Data processed through our Game.

Nevertheless, Internet-based data transmissions can always have security vulnerabilities, so that absolute protection cannot be guaranteed. And databases or records containing Personal Data may be breached inadvertently or by unlawful intrusion. If we learn of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as soon as possible after the breach is discovered.

#### *Is data transferred to a third country?*

We process data in the course of operating our website. We do not normally transfer Personal Data to countries outside Turkey and the EEA. However, if we do, we ensure that the processing of your Personal Data is governed by processing contracts that include standard contractual clauses to ensure a high level of data protection.

#### *Special category data*

# BATTLE BIT REMASTERED

## Privacy Policy

We do not process special category data unless it is necessary for the use of our services and explicit consent has been given.

### *Minors*

In accordance with the PDPL and the GDPR, the processing of Personal Data relating to a person younger than 16 years requires the consent of a parent or legal guardian. We do not knowingly collect any data from users under the age of 16, unless verifiable parental or legal guardian consent is obtained through direct offline contact. If you suspect that a user is a minor, please report it to us as soon as possible.

### *Automated Decision Making*

Automated decision making is the process of making a decision by automated means without human involvement. Automated decision making does not occur.

### **DO NOT SELL**

We do not sell your personal information.

### **Your rights and privileges**

#### *Rights to protect your data*

Under the PDPL, you have the following rights:

- *Right to be informed*
- *Right to access*
- *Right to rectification*
- *Right to erasure*
- *Right to deletion*
- *Right to object/opt-out*

Under the the GDPR, you may exercise the following rights:

- Right to information
- Right to rectification
- Right to deletion
- Right to data portability
- Right to object
- Right to withdraw consent
- Right to lodge a complaint with a supervisory authority
- Right not to be subject to a decision based solely on automated processing.

If you have any questions about the type of Personal Data we hold about you, or if you wish to exercise any of your rights, please contact us.

### *Updating your data*

If you believe that the data we hold about you is inaccurate or that we are no longer entitled to use it and you wish to request that it be rectified or erased, or object to its processing, please contact us.

### *Withdrawal of your consent*

You may withdraw any consent you have given at any time by contacting us. The legality of the data processing carried out until the withdrawal remains unaffected by the withdrawal.

### *Request for information*

If you would like to make a request for information about your data, you can inform us in writing. We will respond to requests for information and correction as quickly as possible. If we are unable to

# BATTLE BIT REMASTERED

## Privacy Policy

respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with the personal information you have requested or to make a correction, we will tell you why.

### *Complaint to a supervisory authority*

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The competent data protection authority in Turkey is: The Turkish Personal Data Protection Authority, Nasuh Akar Mahallesi Ziyabey Caddesi, 1407 Sokak No:4 06520, Çankaya, Ankara Turkey ([www.kvkk.gov.tr](http://www.kvkk.gov.tr))

### **Validity and questions**

This Privacy Policy was last updated on Monday, 14th of September, 2023, and is the current and valid version. However, we want to point out that from time to time due to actual or legal changes a revision to this policy may be necessary.

If you have any questions about this policy or our data protection practices, please contact us using [support@joinbattlebit.com](mailto:support@joinbattlebit.com) or write to us at the above address.