

Privacy Policy

Black Shell Media, LLC (“we,” “us,” or “our”) respects your privacy rights and is committed to being transparent with our use of your information. If you are a resident of or access our Services from within the European Economic Area (“EEA”), we apply the privacy protection to your information required by the General Data Protection Regulation.

This Privacy Policy applies to our use of your information throughout our Services, unless a part of the Services is governed by its own privacy policy. Our Services currently include:

- Our website at blackshellmedia.com and Steam pages of games that we publish (such as https://store.steampowered.com/app/493080/Card_Quest/ and https://store.steampowered.com/app/383230/Dungeon_Souls/) (the “Websites”)

About

This Privacy Policy concerns the information that (i) you may provide us with (for example when you sign up with our Service), (ii) we may collect from you automatically when you use our Services, (iii) we may receive from other, third party sources (for example social media services), or (iv) collect from you because you made this information publically available (for example public archives).

We protect the Personal Information that we collect from you in accordance with this Privacy Policy. Personal information is such that can **identify you as an individual** (for example your name, age, gender, online user name, or your political opinion or religious belief) as well as information that can only **personally identify you together with other information** that we collect from you (for example your IP address, your activity with our Services, hardware device ID, or your browser type) (“Personal Information”).

We also collect, store, use, disclose, and share, data from you which is anonymized by isolating the information from any personal identifiers (“Non-Personal Information”). Non-Personal Information cannot be used by us, or third parties that we share such information with, to identify you.

We may store some of your information via **local storage** (for example cookies) temporarily or permanently on your internet enabled device, which allows us to retrieve information on your device about your use of the Services (e.g. which language you prefer or your log in name).

What We Collect and How We Use It

General Use Policy. We may use your information to provide, administer, maintain, and improve our Services; personalize your experience of the Services; analyze user activity of our Services; provide you with support regarding our Services; engage in advertising activity; to

enforce our rights and the rights of other users of the Services, and to comply with our legal obligations; or to prevent imminent and serious bodily harm to a person.

Reaching Out To Us. We collect information from you when you send us or one of our representatives an email or otherwise correspond with us directly (for example your name, email address, or statements that you make). We store this information, including Personal Information, for purposes of responding to your request and providing you with the necessary support regarding our Services. We will not collect information if your communication with us does not relate to our Services or future services.

Information We Collect Automatically From You

Automatic Collection. We make use of various third party analytic and reporting technologies and partner with third parties to record information automatically when you use our Service. Currently we employ the following third party services, each of which collects data in accordance with their respective privacy policies:

- Google Analytics

When You Access Our Website. When you access our Website, we automatically collect the following information to help manage, monitor and improve our Website:

- Your basic computer information in anonymized form
- Your use activity of our Website in anonymized form
- Your preferred use of the Website in anonymized form
- Your IP address in anonymized form, the URL you visited from or that referred you to the Website, the timestamp of your visit, your preferred browser language, and your country code

How We Share Your Information With Third Parties

Our Sharing Policy. We may share your Personal Information with our subsidiaries or successors and affiliated third parties for the purposes described in this Privacy Policy. We will not share your Personal Information for any other purpose other than (i) with your consent, or (ii) in the following events: (a) to prevent an emergency, (b) to prevent harm to others, (c) to respond to legal requirements, (d) to protect or enforce our rights and policies, (e) to protect or enforce the rights of a third party, or (f) as required by law (including, without limitation, to comply with a subpoena or court order). In the event of such sharing, we will continue to treat your Personal Information as subject to the protections described in this Privacy Policy.

We may transfer Personal Information for processing in countries in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen. **If you have accessed our Service from within the EEA, additional rules apply to the transfer of your Personal Information (see below).**

Third Party Service Providers. We contract with third parties who help us with our Services. Currently the third parties are:

- Jetpack
- Cloudflare, Google Docs, and Dropbox for storing information

We take commercially reasonable precautions to prevent such third parties from disclosing your Personal Information. Their use of this information is contractually bound to the purposes of this Privacy Policy and their own privacy policy (found on their websites). However, we cannot guarantee that such third parties will not disclose your information.

How We Protect Your Information

We take reasonable measures to protect the confidentiality, security, and integrity of your Personal Information. We have implemented physical, electronic and managerial procedures in order to help safeguard and prevent unauthorized access, use, alteration, modification and/or disclosure of your information by which you can be identified.

We cannot ensure or warrant perfect security. Accordingly, we assume no liability for any disclosure of data due to errors in transmission, unauthorized third party access or other acts of third parties, or acts or omissions beyond our reasonable control.

Our Policy On Information From Children

Under Thirteen. Our Services are intended for users ages 13 and older only. Accordingly, we will not knowingly collect or use any information that can identify your children that is under 13. In addition, we will delete any information in our possession that we discover originates from a child under the age of 13.

Parental Controls. If you believe that your child's information was mistakenly collected through our services, please contact us immediately at contact@blackshellmedia.com and we will work with you to determine if this is the case and remove such information if necessary.

Your Control Over Our Use Of Your Personal Information

Personal Information. You may review, update, change, or delete your Personal Information by requesting that we cancel your access to our Services (for example, delete your Forum or Game Account or cancel your Crowdfunding participation) at contact@blackshellmedia.com.

Cookies And Local Storage. You may delete local storage or cease our placement and use of local storage by setting your browser or internet enabled device to disable local storage. Please be aware that local storage is important for your access of our Services and if you disable local storage, your access of our Service may be restricted or impossible.

Opting-Out. You may opt-out from having your Personal Information used for certain purposes. If you no longer wish to receive our newsletters and promotional communications, you may opt-out of receiving them by following the instructions included in each newsletter or communication or by emailing us at contact@blackshellmedia.com.

Retention. We retain your Personal Information only as long as it is necessary for us to fulfill the purposes outlined in this Privacy Policy. In addition, we may retain your information for an additional period as is required to (for example to comply with our legal obligations, resolve disputes, and enforce agreements). If required by applicable law, we shall delete your information when the information is no longer necessary or requested to do so.

California Privacy Rights. California Civil Code section 1798.83 permits customers who are California residents to request certain information regarding disclosure within the immediately preceding calendar year of that resident's Personal Information to third parties and in some cases affiliates for their direct marketing purposes. To make such a request, contact us through the information provided below. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through the email address. For your protection, you will be required to provide proof of your identity to obtain a copy of your Personal Information.

Rules When You Access the Service from Within the EEA

If you access our Service from within an EEA Member State, the following privacy rules apply to you.

The Purposes For Which We Collect Information From You. We only process your Personal Information if we have a lawful purpose pursuant to Article 6(1) GDPR. The following lawful purposes apply to such information that we collect from you:

- **Necessary Collection To Perform Services – GDPR Article 6(1)(b).** We process your Personal Information when you download and play the Games on behalf of the developers of these Games who require this information in order to fulfill the obligations and perform the services related to the Game.
- **Consent Based Collection – GDPR Article 6(1)(a).** We process your information because you gave us your explicit consent to use this information. You may withdraw this consent, and we will cease to use your Personal Information for this purpose, by contacting us at contact@blackshellmedia.com.
- **Other Purposes.** We may process your information for other reasons when we are legally obliged to under GDPR Article 6(1)(c) (for example for tax purposes), it is necessary in order to protect the vital interests of you or someone else under GDPR Article 6(1)(d), it is necessary in public interest under GDPR Article (6)(e), or for security reasons, to better understand your and others' interest and preferences for our Services, to improve our Services, for internal purposes (for example for auditing), and to secure and enforce our rights under GDPR Article 6(1)(f).

Your Data Rights. You have the right to correct, update, change (if the information we process is incorrect), or delete your Personal Information or demand that we release such Personal Information, as well as restrict how we use or entirely end the use of such Personal Information, by contacting us at **contact@blackshellmedia.com**. The above rights may be limited in certain necessary situations. For example, we will keep your Personal Information if, at the time or in the foreseeable future, it is necessary for us to establish, commence, or defend against a legal claim.

Withdrawing Consent. If we have received Personal Information from you because of your explicit consent, you can withdraw this consent at any time by contacting us at **contact@blackshellmedia.com**.

Transferring and Sharing Data. We will never transfer your Personal Information to a third party or a successor of ours that resides in a country that does not adhere or cannot guarantee the same privacy protection standards as provided by the GDPR. Currently we share your Personal Information with the following parties outside of the EEA, all of which protect your rights pursuant to the GDPR:

- We use services from Google LLC (Google Docs), Cloudflare Inc. (Cloudflare), and Dropbox, Inc. (Dropbox), to store your information. These third parties are located in the US and each applies the safeguards pursuant to the EU-US Privacy Shield; You can view each of their privacy protection standards at <https://policies.google.com/privacy>, <https://www.dropbox.com/privacy>, and <https://www.cloudflare.com/privacypolicy/>
- We use services from Jetpack to optimize your use of our Websites and to track the performance of our Websites. This third party is located in the US and applies the safeguards pursuant to the EU-US Privacy Shield; you can view its privacy protection standards at <https://automattic.com/privacy/>

Parental Control. Children Under Sixteen. We do not acquire Personal Information based on consent from children under the age of sixteen. If you believe that your child's Personal Information was mistakenly collected through our Service, please contact us immediately at **contact@blackshellmedia.com** and we will work with you to determine if this is the case and grant you the rights under this Section.

Liability For Affiliated Third Parties. In the event that a data breach occurs at one of our affiliated third parties (for example a breach of their security that leads to destruction, alteration, loss, or unauthorized disclosure of your Personal Information), we are jointly liable with that affiliated third party for such damages of yours that arise from that data breach, but only if we cannot show that we were not responsible for the data breach.

Complaint. If you believe that your rights described in this Privacy Policy are violated or you believe that we have not held ourselves to the standards described in this Privacy Policy or under the GDPR, you have the right to lodge a complaint with the respective supervisory authority in the country of your residence.

Changes to our Privacy Policy

We may make changes to this Privacy Policy from time to time. If so, we will notify you of any material changes by email and posting a notice within our Services. If you receive notification of a change in our Privacy Policy, you must review the new Privacy Policy carefully to make sure you understand our practices and procedures. You may be unable to receive such notices changes to the Privacy Policy if your cookies are disabled.

Contact

For further information on our Privacy Policy, or for questions or requests on information that we may have collected from you, please contact us at **contact@blackshellmedia.com**.

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