

# PRIVACY NOTICE

Mainframe Industries Oy ("we") respects your privacy and is committed to protecting your personal data. This Website and Cookie Privacy Notice ("Privacy Notice") will inform you as to how we process your personal data on our website and through cookies set either on our website or on our services. Regarding this data, we shall be acting as a data controller in the meaning of the EU data protection legislation. To read more about how we process your personal data when you play our games, please consult our Game Privacy Notice.

This Privacy Notice may be updated if required to reflect the changes in data processing practices or regulation. The current version can be found on our website. We will not make substantial changes to this Privacy Notice or reduce your rights under this Privacy Notice without providing a notice thereof. This Privacy Notice only covers data processing carried out by Mainframe or by Mainframe's sub-contractors on behalf of Mainframe.

The Privacy Notice does not address, and we are not responsible for, the privacy practices of any third parties. Mainframe disclaims all responsibility for the processing carried out by third parties, also in cases where our services include hyperlinks or other links to third-party websites or services. Privacy, security, and online safety are important for us, and we process all personal data with due care and in accordance with applicable laws and regulations.

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## **1. WHO IS DATA CONTROLLER?**

The data controller for the processing described in this notice is:

### **Mainframe Industries Oy**

If you have questions regarding this Privacy Notice, please contact us using the contact details found in our website at <https://themainframe.com/en/contact/>.

## **2. WHAT ARE COOKIES?**

Cookies are small text files stored on your terminal equipment, such as a computers, tablets, or smartphones, when you browse websites. Cookies contain character strings that enable functions to be performed and contain information on how you have interacted with websites. The purpose of cookies is not to harm your device, nor do they read other information from your equipment's hard drive or spread viruses. Data can be stored in cookies while you use online services or visit websites, and in between visits.

Cookies and similar technologies provide various functionalities common to modern websites. Cookies are used widely in both public-sector and commercial websites. They are a key component of safe, efficient, and user-friendly functioning of services based on electronic communication.

Cookies have different functionalities and these functionalities also determine whether they are regarded as necessary or non-necessary (voluntary) cookies. Necessary cookies are cookies that are necessary for our website or services to function. These cookies are automatically activated and do not require your consent. Other cookies are not necessary for the website or service to function and require your consent to be activated.

You can also choose to give your consent only to some voluntary cookies or to withdraw all or some of your consents. Consent can be withdrawn any time with link in the legal page <https://themainframe.com/en/legal/>

### **3. WHAT COOKIES DO WE USE AND WHAT INFORMATION DO THE COOKIES WE USE COLLECT?**

- **Necessary cookies**

These cookies are necessary for the operation of our website and enable the basic functionality and security features of our website. You can set your browser to block these cookies, but please note that the website may not work as expected if these cookies are blocked.

Necessary cookies we use:

<b>Name</b>	<b>Vendor</b>	<b>Purpose</b>	<b>Domain</b>	<b>Expiry</b>
_csrf	Mainframe	To secure forms	.playpaxdei.com	After the browsing session ends
NEXT_LOCALE	Mainframe	remember the preferred language	.playpaxdei.com	?

- **Targeted cookies**

We use these cookies to collect information about how you use our websites to better target advertising to you and to better match your interests. We may share the information used by these cookies with other parties who help manage the advertisements displayed on the websites - see "What third parties do we use?" for more information.

Targeted cookies we use:

<b>Name</b>	<b>Vendor</b>	<b>Purpose</b>	<b>Domain</b>	<b>Expiry</b>
gcl_aud	Google AdSense	Store and track conversions	.playpaxdei.com	3 months
_ga	Google Analytics	Distinguish individual users	.playpaxdei.com	2 years

_gid	Google Analytics	Distinguish individual users	.playpaxdei.com	24 hours
_gat	Google Analytics	Limit amount of user requests in order to maintain website's performance	.playpaxdei.com	1 minute
AMP_TOKEN	Google Analytics	A unique ID to each user	.playpaxdei.com	30 seconds - 1 year
_gac_*	Google Analytics	A unique ID to make Google Analytics and Ads work together	.playpaxdei.com	90 days
_ttp	TikTok	Measure and improve the performance of advertising campaigns Personalize the user's experience on TikTok	.playpaxdei.com	13 months
_fbp	Facebook	Store and track visits across websites	.playpaxdei.com	3 months

- **Social media cookies**

We use these cookies when you share information by clicking social media links on our website or when you interact with our content on or through a social media site (for example, Facebook). These cookies collect information about how you interact with these social media sites. Such information is, for example, information about whether you have a user in the social media service or whether you have logged into the service while interacting with the content on the website. Such information may be used in targeted advertising.

Social media cookies we use:

Name	Vendor	Purpose	Domain	Expiry
_twitter_sess	Twitter	Track Twitter user sessions	.twitter.com	13 months
guest_id	Twitter	Track Twitter authentication	.twitter.com	13 months
eu_cn	Twitter	Track Twitter cookie notice	.twitter.com	13 months
d_prefs	Twitter	Track Twitter cookie preferences	.twitter.com	13 months

#### 4. WHICH THIRD PARTIES DO WE USE?

When you use our website, third-party cookies may be stored in your browser, which we do not control. Such cookies may be stored when the website you are visiting uses third-party analytics or marketing automation or embeds content displayed on the website through a third-party website. Consult the privacy and cookie statements of such third parties to find out how these third parties use cookies.

Name	Vendor	Purpose	Domain	Expiry
DE	Google	used to show Google ads on non-Google sites	.doubleclick.net	13 months
DSID	Google	identify a signed-in user on non-Google sites and to remember whether the user has agreed to ad personalization	.doubleclick.net	2 weeks
__Secure-1PAPISID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.google.com	2 years
__Secure-1PSID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.google.com	2 years
__Secure-1PSIDC	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.google.com	2 years
__Secure-3PAPISID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.google.com	2 years
__Secure-3PSID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.google.com	2 years
__Secure-3PSIDC	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.google.com	2 years
1P_JAR	Google	Based on recent searches and previous interactions, custom ads are shown on Google sites.	.google.com	1 week
AEC	Google	Ensure that requests within a browsing session are made by the user, and not by other sites.	.google.com	6 months
APISID	Google	Personalizes Google ads on websites based on recent searches and interactions.	.google.com	2 years
HSID	Google	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect user data from unauthorized access.	.google.com	2 years
NID	Google	Stores visitors' preferences and personalizes ads on Google websites based on recent searches and interactions.	.google.com	6 months

Name	Vendor	Purpose	Domain	Expiry
SAPISID	Google	Google collects visitor information for videos hosted by YouTube.	.google.com	Persistent
SID	Google	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized acces	.google.com	2 years
SIDCC	Google	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized access.	.google.com	3 months
SOCS	Google	store a user's state regarding their cookies choices.	.google.com	13 months
SSID	Google	Google collects visitor information for videos hosted by YouTube on maps integrated with Google Maps.	.google.com	Persistent
__Secure-1PAPISID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.youtube.com	2 years
__Secure-1PSID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.youtube.com	2 years
__Secure-3PAPISID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.youtube.com	2 years
__Secure-3PSID	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.youtube.com	2 years
__Secure-3PSIDC	Google	Builds a profile of website visitor interests to show relevant and personalized ads through retargeting.	.youtube.com	2 years
__Secure-YEC	Google	used to detect and resolve problems with the service at Google	.youtube.com	13 months
APISID	Google	Personalizes Google ads on websites based on recent searches and interactions.	.youtube.com	2 years
CONSENT	Google	store a user's state regarding their cookies choice	.youtube.com	2 years
DEVICE_INFO	Google	Used to track user's interaction with embedded content.	.youtube.com	6 months
HSID	Google	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect user data from unauthorized access.	.youtube.com	2 years
LOGIN_INFO	Google	Technical cookie for content reproduction	.youtube.com	6 months

PREF	Google	preferred page configuration and playback preferences like explicit autoplay choices, shuffle content, and player size.	.youtube.com	8 months
SAPISID	Google	Google collects visitor information for videos hosted by YouTube.	.youtube.com	Persistent
SID	Google	Security cookie to confirm visitor authenticity, prevent fraudulent use of login data and protect visitor data from unauthorized access.	.youtube.com	2 years
SSID	Google	Google collects visitor information for videos hosted by YouTube on maps integrated with Google Maps.	.youtube.com	Persistent
VISITOR_INFO1_LIVE	Google	Tries to estimate the users' bandwidth on pages with integrated YouTube videos.	.youtube.com	6 months
YSC	Google	Registers a unique ID to keep statistics of what videos from YouTube the user has seen.	.youtube.com	Session
OTZ	Google	Links activities of website visitors to other devices that are previously logged in via the Google account.	www.google.com	1 month
_abck	TikTok	Used to detect and defend against replay-cookie-attacks – The cookie is necessary for the security and integrity of the website.	.tiktok.com	1 year
tta_attr_id	TikTok	deliver a series of advertisement products such as real time bidding from 3rd party advertisers.	.tiktok.com	1 year
cookie-consent	TikTok	store a user's state regarding their cookies choice	.tiktok.com	1 year
_ttp	TikTok	tracking the use of embedded services.	.tiktok.com	1 year
ttwid	TikTok	Used by the social networking service, TikTok, for tracking the use of embedded services.	.tiktok.com	1 year
tta_attr_id_mirror	TikTok	deliver a series of advertisement products such as real time bidding from 3rd party advertisers.	.tiktok.com	1 year
tt_csrf_token	TikTok	provide protection against hackers.	.tiktok.com	Session

You can read more about the cookies set by third parties and their privacy policies at their own web sites

Vendor	Privacy policy
Google	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>
Tiktok	<a href="https://www.tiktok.com/legal/page/eea/privacy-policy/en">https://www.tiktok.com/legal/page/eea/privacy-policy/en</a>
Facebook	<a href="https://www.facebook.com/privacy/policy/">https://www.facebook.com/privacy/policy/</a>
Twitter	<a href="https://twitter.com/en/privacy">https://twitter.com/en/privacy</a>

## 5. INFORMATION WE COLLECT AND HOW WE COLLECT IT

In the following, we will tell you which types of personal data we may collect about you and how we collect it. In section 6, we have in a table explained the purposes for which we process your personal data and the lawful bases we rely on.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- A. Identity Data** includes your surname and last name, age
- B. Contact Data** includes your email or other online contact information, telephone number and address
- C. Consent data** includes data on consents you have given for electronic marketing when you sign-up for our email list.
- D. Technical Data** includes User's IP address, browser type and version, preferred language, geographical location using IP address or the GPS, wireless, or Bluetooth technology on your device, operating system and computer platform, the full Uniform Resource Locator (URL) clickstream to, though, and from our Services, including date and time; and areas of our Services User has visited. Technical data also includes data on necessary cookies, which are expected by you, such as remembering usernames, passwords, and preferences.
- E. Cookie data** includes data on non-necessary cookies. We need your consent for processing these cookies. Please see more specific descriptions of the cookies we use in point 3.

The identity (A) and contact (B) information is provided directly by you through the website. The technical (D) and cookies (E) data is collected directly from your use of our website and interaction within it.

## 6. THE PURPOSES AND THE LEGAL BASIS

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- i. Where you have given your consent cf. GDPR Article 6 (1) (a).
- ii. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests cf. GDPR Article 6 (1) (f).

We have set out below, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We note that the current version of our website is not final, and as the game evolves, new features will be implemented, and the game will be made available outside the testing environment. Consequently, new purposes for processing of personal data may emerge. This Privacy Notice will be updated accordingly before personal data will be processed for new purposes.

Purpose/Activity	Type of data	Legal basis for processing including basis of legitimate interest
<b>To operate our website</b> and offer you information on our services as well as to offer you the possibility to: <ul style="list-style-type: none"><li>• opportunity to contact us and give feedback</li><li>• sign up and sign into our services</li><li>• having your personal profile which you can use to get information on our services and reach out to us</li></ul>	(D) Technical	We have a legitimate interest to maintain our website and use necessary cookies to provide you the experience you explicitly request.
<b>For quality improvement and trend analysis</b>	(D) Technical (E) Cookie	With your <b>consent</b> .
<b>For statistical and analytical purposes</b> We may gather Technical and Cookie Data and anonymous and aggregate data to generate reports and statistics. We may use statistics and reports for sales and marketing purposes.	(D) Technical (E) Cookie	With your <b>consent</b> .

<p><b>Direct marketing</b> We process personal data for the purposes of direct marketing, such as the sending of newsletters or similar marketing material on game development and signing up for early release or game testing. Users can unsubscribe from receiving such material at any time.</p>	<p>(A) Identity (B) Contact (C) Consent</p>	<p>Your <b>consent</b> for receiving direct marketing.</p>
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To the extent that we have referred to our legitimate interest as the legal basis for the processing of personal data specified above, we have conducted a balancing test for those interests to ensure that our interest is not overridden by your interests or fundamental rights and freedoms. Please contact us using the contact details found in our website at <https://theframe.com/en/contact/> if you wish to receive more information on the balancing test.

## 7. SHARING OF INFORMATION COLLECTED

We only share personal data within the organisation of Mainframe if and as far as reasonably necessary to perform and develop our Services.

We do not share personal data with third parties outside of Mainframe's organization unless one of the following circumstances applies:

- when it is necessary for the purposes listed in section 6
- when required by law we may disclose your personal data to public authorities such as tax authorities, and law enforcement authorities
- we may assign your personal data, to any person or entity that acquires all or substantially all our business, stock or assets, or with whom we merge.
- when we have your explicit consent for sharing the data outside Mainframe's organization for other reasons than those mentioned above.
- when we believe in good faith that disclosure is necessary to establish or exercise our legal rights or defend against legal claims, protect your safety or the safety of others, investigate fraud, or respond to a government request.

We may share information, including personal information, with our trusted third-party service providers, that we use to provide services to us and process your data on our behalf and under our instruction. These third-party service providers may have access to or process your personal information for the purpose of providing these services for us. We do not permit our third-party service providers to use the personal information that we share with them for any other purpose than in connection with the services they provide to us. We have entered into data processor agreements with our data processors

## TRANSFER TO THIRD COUNTRIES

The data handled within our service platform for investors and founders is stored within the EU/EEA.

For our website functions, we use service providers in several geographical locations, for example the providers of Google Analytics and Contentful. As such, we and our service providers may transfer personal data to, or access it in, jurisdictions outside the European Economic Area or the User's domicile. We will take steps to ensure that Users' personal data receives an adequate level of protection in the jurisdictions in which we process it. We provide adequate protection for the transfer of personal data to countries outside of the European Economic Area through a series of intercompany agreements and agreements with our service providers based on the Standard Contractual Clauses or other similar arrangements.

We use the Standard Contractual Clauses approved by the European Commission (Commission Implementing Decision (EU) 2021/914). The clauses can be found here: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021D0914&from=EN>.

More information regarding the transfers of personal data may be obtained by contacting us on addresses mentioned in this Privacy Notice.

## **8. DATA RETENTION**

Mainframe does not store personal data longer than is legally permitted and necessary for the purposes of providing the Services or the relevant parts thereof. The storage period depends on the nature of the information and the purposes of processing.

### **Retention times per data group:**

#### **Identity Data**

**2 years** after last interaction

#### **Contact Data**

**2 years** after last interaction

#### **Consent Data**

Until consent is withdrawn, but max. **3 years**.

#### **Technical Data**

**1 year** after last interaction

#### **Cookie Data**

We use both session-specific cookies and persistent cookies. You can find the retention times of all cookies in section 3.

- Session-specific cookies are stored in the memory for the duration of the session and are deleted when the user has closed the browser.
- Permanent cookies are stored on the hard drive of the user's computer and are kept for a certain period or until the user withdraws consent for the cookies.

## 9. HOW TO EXERCISE YOUR DATA PROTECTION RIGHTS

You have certain choices available to you when it comes to your personal information. Below is a summary of those choices, how to exercise them. Please note that some of these choices are legal basis -specific, meaning that they can only be used with specific legal bases. Please consult this page at the Finnish Data Protection Ombudsman's website to know your specific rights with each used legal basis: [What rights do data subjects have in different situations?](#) .

Under certain circumstances, you have the right to:

- Request to know whether we process your personal information
- Request to access your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party (also known as data portability). Please note that you do not have this right when processing is based on legitimate interest.
- Where our processing is solely based on your specific consent you have the right to with-draw your consent at any time. Such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of the data protection rights that are available to you then please send your request to us using the contact details found in our website at <https://theframe.com/en/contact/> and we will action your request in accordance with applicable data protection laws.

You have the right to complain to your local data protection authority if you are unhappy with our data protection practices. In Finland you can lodge a complaint with the Office of the Data Protection Ombudsman at [Notification to the Data Protection Ombudsman](#).

## **10. CHANGES TO THIS PRIVACY NOTICE**

We note that the current versions of the out website and services are not final, and the processing of personal data will change as new features will be implemented and the game is made available outside the testing environment. This Privacy Notice will be updated accordingly before changes are implemented.

This Privacy Notice may also be updated from time to time to reflect changing legal, regulatory, or operational requirements. We encourage you to periodically consult our Privacy Notices for the latest information on our privacy practices.

If there are any material changes to this Privacy Notice, and you have signed up to our email list, you will be notified by email prior to the change becoming effective.