

For whom resident in EEA [this Privacy Notice](#) will apply:

For whom resident in Türkiye [this Privacy Notice](#) will apply:

OKI GAMES PRIVACY NOTICE

Last Updated: June 17, 2023

OKIGAMES Oyun ve Yazılım Hizmetleri Limited Şirketi is committed to protecting and respecting the privacy of our user ("you" or "your"). We collect and process data that (either on its own or in combination with other information) identifies or is associated with you ("Personal Data") in accordance with this privacy notice ("Notice") and in compliance with the relevant data protection regulations and laws. This Notice provides you with the necessary information regarding your rights and our obligations.

With this Privacy Notice, OKIGAMES Oyun ve Yazılım Hizmetleri Limited Şirketi as the data controller, would like to inform you, within the framework of our obligation to inform.

In this Notice, "Services" refers to our Games, Websites, and any related services or properties we control; "Games" refers to our games, applications, and other products, including BattleBit; and "Websites" refers to websites and other online properties we control, including www.___. The expression "your data" is used when referring to personal data that relates to you as an identified or identifiable individual.

It is important that you read this Notice before accessing or using the Services so that you are aware of how and why we may use data relating to you. In addition to this, we encourage you to carefully review our Terms of Service on our website, which govern your use of our Services.

By playing the Game, you acknowledge you have read and understood this Privacy Notice.

1. IDENTITY OF DATA CONTROLLER

This privacy notice is drafted by *OKIGAMESS Oyun ve Yazılım Hizmetleri Limited Şirketi* (hereinafter referred to as "Company", "we", "us", "our" or "us", "OKIGAMESs"), a company located at *Şemikler Mah. 6287 Sk. No:55/6, Karşıyaka/İzmir/Türkiye*. *OKIGAMESS Oyun ve Yazılım Hizmetleri Limited Şirketi* is the data controller with regard to the activities described in

this Notice. **As the data controller, we would like to inform you, as part of our obligation to provide information, through this Notice.**

Also, while operating the Services, we may share your data with partners we work with. Please be aware that certain partners we work with operate as separate data controllers and, therefore, independently determine how and why they process your data. To learn more about these partners and their specific data processing practices, please refer to Article 4 of this Notice.

2. WHAT KIND OF PERSONAL DATA DO WE USE?

When you access and use our Services, we may collect the information you submit to us or through the Services, for example, when creating an account, sending messages in the Games, or contacting us for support. We may also automatically collect information about your use of the Services and the device you use to access the Services.

Within the framework of the Service offered, we may process the following data relating to you;

- Your name, email address, or other contact information (for example, information provided when creating an account with Steam) as well as your account ID;
- Online identifiers such as your in-game alias, IP address, identifiers we assign to your account, or hardware or operating system based identifiers
- Technical information about the device you use to play our Games or use our other Services (for example, information about its type, model, manufacturer, operating system, language, display, processor, or memory)
- Your coarse location (for example, country, state, or city), inferred from your IP address,
- Information about your use of the Services
- Voice chat recordings (User must opt-in to use the Voice Chat Feature):
 - **Local voice chat**
 - **Squad voice chat**
 - **Squad leader communication voice chat**

of the last 40 seconds of voices all time **if user has agreed to opt-in to use Voice Chat Feature** upon first launch of the game or opt-in from in game audio settings (can be opt-in/out anytime from in game audio settings).

- Others including log records, reports filed by another player about you and the data required to be obtained within the framework of the relevant legislation and the data

obtained as a data controller may be processed for the purposes specified in Article 3 of this Notice and for the legal reasons specified in Article 4.

WHERE DO WE COLLECT YOUR DATA FROM?

Primarily, we collect data directly from you or your device when you use our Services.

We may also automatically create and process Personal Data, in particular, to provide and maintain our electronic work environment and ensure sufficient security, such as log data.

3. PURPOSE OF PERSONAL DATA PROCESSING

We only process your Personal Data where applicable law permits it or requires it, including where the processing is necessary to comply with the legal obligation, for our legitimate interests or the legitimate interests of third parties, to protect your vital interests, or with your consent if applicable law requires consent.

The Company takes your privacy very seriously and will not disclose, share, or sell your Personal Data without your consent unless required to do so by law.

The personal data processed belongs to the users, and the categories of personal data processed by us are listed below and each data category is processed for the limited purposes specified:

Identity Data: Operating the games and game-related events, identifying users, execution of activities in accordance with the legislation, performance of the Service.

Communication Data: informing you about any modifications to our services and execution of activities in accordance with the legislation.

Other Data (Voice Records, IP Address): Ensuring functionality and moderating disruptive behavior, and execution of activities in accordance with the legislation.

Detailed below are legitimate business purposes and reasons for processing your Personal Data:

- Based on the legal reason that it is clearly stipulated by the law and is mandatory for the data controller to fulfill its legal obligation;
 - ✓ Ensuring that the data is kept accurate and up-to-date,
 - ✓ Execution of information security processes, management of information technology infrastructure and ensuring business continuity.
- Based on the legal reason that data processing is mandatory for performance of contact;

- ✓ Providing of service procurement processes,
 - ✓ Execution of after sales support services,
 - ✓ Ensuring of service sales processes.
- Based on the legal reason that data processing is mandatory for the establishment, exercise or protection of a right;
 - ✓ Follow-up and execution of legal affairs,
 - ✓ Managing the demands and complaints of the users,
 - ✓ Keeping personal data for the duration of the general statute of limitations in order to constitute evidence in possible future disputes.
 - Also, we process your Personal Data based on the legal reason that data processing is mandatory for the legitimate interests of the data controller, provided that it does not harm the fundamental rights and freedoms of the data subject;
 - ✓ Planning and execution of fringe benefits and benefits,
 - ✓ Planning and execution of corporate governance activities,
 - ✓ Monitoring business activities, analyzing them in terms of efficiency and effectiveness.

4. TO WHOM AND FOR WHAT PURPOSES THE PROCESSED DATA MAY BE TRANSFERRED?

As we operate the Services globally, your data is likely to be transferred to and/or processed in countries other than your home country when you access or use our Services. Where allowed by applicable laws and regulations and you giving consent to the transfer of your data outside of your home country by using the Services; we transfer your Personal Data to outside of Türkiye.

Personal data subject to this Notice may be transferred to the systems of domestic and foreign information technology service providers whose services we benefit from and cooperate with in order to fulfill legal obligations and for the legitimate interests of the Company as the data controller. At the same time, it may be transferred abroad and to the databases used in common with them due to the execution of operational processes and receiving support.

If we transfer your Personal Data to another country, we take measures to ensure the protection of your data. This includes transferring your data to countries that have been deemed to provide an equivalent level of protection or implementing appropriate safeguards.

In addition, please keep in mind that certain information you provide or share using our Services may be visible to other users. This may include your public profile information in our games (such as your in-game username), your in-game chat messages, and data used for social features. Please be aware that this information may be publicly accessible, so we advise against submitting or sharing any information you wish to keep private.

If you would like to know more about the measures, we take to ensure the protection of your Personal Data during international transfers, please feel free to reach out to us using the contact information provided in our Notice.

5. THE METHOD AND LEGAL REASON OF COLLECTING PERSONAL DATA

Your personal information can be gathered through legal grounds, such as the execution or performance of a contract, legal obligations of the data controller, protection of rights, explicit consent, and legitimate interests of the data controller. The information may be collected through automated or non-automated means, either verbally or in writing, from you, official institutions, and organizations, as well as through programs and software used within the Company's activities.

We always take necessary measures to protect and maintain the confidentiality and security of your personal data in any situation.

6. RETENTION PERIOD OF PERSONAL DATA

We will retain your data for as long as is necessary to fulfill the purpose(s) for which it was collected, such as providing you with the Services or complying with legal, accounting, or reporting obligations. We may periodically remove inactive accounts or other data from our Games or other Services by deleting or de-identifying them.

After the applicable retention period, we will delete or de-identify your data whenever possible. If it is not feasible to delete or de-identify your data (for instance, if it is stored on a backup server), we will segregate your data from further processing until deletion or de-identification becomes possible. We may use non-identifiable data (such as aggregate data) without any personal identifiers for analytical purposes, even after your data has been deleted or de-identified.

7. YOUR RIGHTS REGARDING THE PROTECTION OF PERSONAL DATA

You have the following rights;

1. to learn whether your personal data has been processed,
2. to request information if your personal data has been processed, to learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
3. to know the third parties to whom your personal data has been transferred domestically or abroad, to request correction of your personal data in case of incomplete or incorrect processing,
4. to request the deletion or destruction of your personal data,
5. in the event that your personal data is incomplete or incorrectly processed, you have the right to request that third parties to whom personal data is transferred be notified of the correction and/or deletion or destruction of personal data,
6. in the event that your processed data is processed exclusively by means of automated systems, you have the right to object in the event of an unfavorable result,
7. in the event of damage due to unlawful processing of your personal data, you have the right to demand compensation for the damage.

8. SUBMITTING YOUR REQUEST WITHIN THE SCOPE OF PROTECTION OF PERSONAL DATA

As personal data owners, if you submit your requests regarding your rights by the methods set out below, the Company will finalize the application requests within 30 (thirty) days at the latest. If the request is rejected, the reason(s) for rejection shall be justified in writing.

You can submit your using one of the channels specified below;

- You can submit your applications you want to make in writing to our Company's *Şemikler Mah. 6287 Sk. No:55/6, Karşıyaka/İzmir/Türkiye* address as the data controller by attaching the necessary documents.
- You can send your applications you want to make via e-mail to support@joinbattlebit.com e-mail address.

In your application;

1. Your name, surname, and signature if the application is in writing,
2. Your country identification number or passport number, if applicable,

3. Your residential or workplace address for notification,
4. Your e-mail address, telephone and fax number, if any,
5. The subject of your request,

According to the nature of your request, information and documents must be provided to us completely and accurately.

If the requested information and documents are not provided as required, there may be problems in the full and qualified execution of the research to be carried out by the Company based on your request. In this case, the Company declares that it reserves its legal rights. For this reason, your application must be sent in a complete and complete manner according to the nature of your request and to include the requested information documents.

EXPLICIT CONSENT

Within the scope of the Privacy Notice, do you accept the processing of your personal data by OKIGAMES for the following purposes?

	YES	NO
Transfer of data abroad due to the presence of servers abroad		

Opt-in to use Voiec Chat Feature