

Privacy Policy of Wyvern

This Application collects some Personal Data from its Users.

This document can be printed for reference by using the print command in the settings of any browser.

Policy summary

Personal Data collected for the following purposes and using the following services:

- **Access to third party services' accounts**
 - **Facebook account access**
Permissions: Email
- **Device permissions for Personal Data access**
 - **Device permissions for Personal Data access**
Personal Data: Storage permission
- **Handling payments**
 - **Apple Pay**
Personal Data: None
- **Hosting and backend infrastructure**
 - **Google Cloud Storage**
Personal Data: Email, IP Address
- **Registration and authentication**
 - **Facebook Authentication (iOS only)**
Personal Data: Email
 - **Google OAuth (iOS, Android, Steam)**
Personal Data: Email

Further information about Personal Data

- **Children's Online Privacy Protection Act**
COPPA Privacy Policy Provisions:

The Data Controller does not knowingly collect or permit the storage or use of any personally identifying information from children under thirteen years of age. All products and services of the Data Owner, including online services and mobile products, are intended for general audiences

over the age of thirteen only.

The Data Controller and Data Owner recognize a special need to protect the personal information of children. If users identify themselves as being children (i.e. under the age of thirteen or under the minimum age in the relevant territory), the user shall have no access to any mobile products of Data Owner, and any information collected online (if any) shall only be in accordance with applicable law. If the Data Owner and/or Data Controller receives notice that a user is under thirteen years of age, the Data Owner and/or Data Controller shall take all applicable steps to remove that user's information and account from Data Owner's products or services, consistent with applicable law. If users identify themselves as being over thirteen but under eighteen, consistent with applicable law, the Data Controller may, in its sole and exclusive discretion: (1) bar the user from inputting personal information into any mobile product or online service; (2) collect certain information for limited purposes only (consistent with applicable law); (3) block or restrict the child from accessing relevant services (such as chat functionality); and/or (4) obtain consent from parents as necessary for the collection, use, and sharing of their children's personal information.

Notwithstanding the foregoing, the Data Controller may, in its sole and exclusive discretion, and regardless of the user's age, suspend the user, its account and any related online services and/or mobile products used by such user. The Data Controller may also investigate any user's account, information and any and all related materials, as well as request additional information from the user regarding the user's account to verify the age of such user.

The Data Controller and Data Owner urge parents to instruct their children to never give out their real names, addresses, phone numbers, or other personally identifying information without parental permission, when using any mobile applications or partaking in any online activity. The Data Controller and Data Owner also recommend that parents familiarize themselves with parental controls available on consoles, mobile telephones, tablets and other devices they provide to their child and accompany their child if less than thirteen years of age. Parents should contact the Data Owner immediately if they have any concerns. Please see the contact information provided in this Privacy Policy.

Contact information

- **Owner and Data Controller**

Ghost Track Inc. - PO Box 2099 - Kirkland, WA 98083 (USA)

Owner contact email: steve.yegge@gmail.com

Full policy

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Types of Data collected

Storage Permission: The Application asks for this permission to enable you to save pictures of your maps to your device in Builder Mode. If you do not use this feature, the Application will not use Storage.

Email address: This Application collects and uses the Email address of the User, for purposes of registration and authentication. The Owner may, on occasion, contact Users via their Email address to provide specific information about their account, such as a notification that the account has been banned for non-compliance with the rules. The Owner may, from time to time, send opt-out marketing messages to the Users via the collected Email.

IP Address: This Application records the IP address from which the User connects to the Application. This is to enable banning malicious accounts, or accounts that do not comply with the Application's rules and community guidelines. IP Address may be saved in logs, to facilitate reviewing the user's activity to ensure that it complies with the Application's rules.

The Personal Data collected by the application is never sold or shared with third parties, except for specifically authorized third-parties for carrying out the service functions listed in this Policy: Namely, the Email address is sent to third-party OAuth providers for authentication, and the Email address may be shared temporarily with a third-party email sender (e.g., SendGrid) for sending marketing emails. These are the only situations in which Personal Data is processed, used, or shared outside the Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

Mode and place of processing the Data

Methods of processing

The Owner takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Owner, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of this Application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Owner at any time.

Legal basis of processing

The Owner may process Personal Data relating to Users if one of the following applies:

- Users have given their consent for one or more specific purposes. Note: Under some legislations the Owner may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law;
- provision of Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof;
- processing is necessary for compliance with a legal obligation to which the Owner is subject;
- processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;
- processing is necessary for the purposes of the legitimate interests pursued by the Owner or by a third party.

In any case, the Owner will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The Data is processed at the Owner's operating offices and in any other places where the parties involved in the processing are located.

Depending on the User's location, data transfers may involve transferring the User's Data to a country other than their own. To find out more about the place of processing of such transferred Data, Users can check the section containing details about the processing of Personal Data.

Users are also entitled to learn about the legal basis of Data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Owner to safeguard their Data.

If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Owner using the information provided in the contact section.

Retention time

Personal Data shall be processed and stored for as long as required by the purpose they have been collected for.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Access to third party services' accounts, Handling payments, Registration and authentication, Hosting and backend infrastructure and Device permissions for Personal Data access.

For specific information about the Personal Data used for each purpose, the User may refer to the section "Detailed information on the processing of Personal Data".

Facebook permissions asked by this Application

This Application may ask for some Facebook permissions allowing it to perform actions with the User's Facebook account and to retrieve information, including Personal Data, from it. This service allows this Application to connect with the User's account on the Facebook social network, provided by Facebook Inc.

For more information about the following permissions, refer to the [Facebook permissions documentation](#) and to the [Facebook privacy policy](#).
The permissions asked are the following:

Basic information

By default, this includes certain User's Data such as id, name, picture, gender, and their locale. Certain connections of the User, such as the Friends, are also available. If the User has made more of their Data public, more information will be available.

Email

Provides access to the User's primary email address.

Device permissions for Personal Data access

Depending on the User's specific device, this Application may request certain permissions that allow it to access the User's device Data as described below.

By default, these permissions must be granted by the User before the respective information can be accessed. Once the permission has been given, it can be revoked by the User at any time. In order to revoke these permissions, Users may refer to the device settings or contact the Owner for support at the contact details provided in the present document.

The exact procedure for controlling app permissions may be dependent on the User's device and software.

Please note that the revoking of such permissions might impact the proper functioning of this Application. If User grants any of the permissions listed below, the respective Personal Data may be processed (i.e accessed to, modified or removed) by this Application.

Contacts permission

Used for accessing contacts and profiles on the User's device, including the changing of entries.

Storage permission

Used for accessing shared external storage, including the reading and adding of any items.

Detailed information on the processing of Personal Data

Personal Data is collected for the following purposes and using the following services:

- **Access to third party services' accounts**
- **Device permissions for Personal Data access**
- **Handling payments**
- **Hosting and backend infrastructure**
- **Registration and authentication**

Further information about Personal Data

- **Children's Online Privacy Protection Act**

The rights of Users

Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Users have the right to do the following:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. Further details are provided in the dedicated section below.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right, under certain circumstances, to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right, under certain circumstances, to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that the Data is processed by automated means and that the processing is based on the User's consent, on a contract which the User is part of or on pre-contractual obligations thereof.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Details about the right to object to processing

Where Personal Data is processed for a public interest, in the exercise of an official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a ground related to their particular situation to justify the objection.

Users must know that, however, should their Personal Data be processed for direct marketing purposes, they can object to that processing at any time without providing any justification. To learn, whether the Owner is processing Personal Data for direct marketing purposes, Users may refer to the relevant sections of this document.

How to exercise these rights

Any requests to exercise User rights can be directed to the Owner through the contact details provided in this document. These requests can be exercised free of charge and will be addressed by the Owner as early as possible and always within one month.

Additional information about Data collection and processing

Legal action

The User's Personal Data may be used for legal purposes by the Owner in Court or in the stages leading to possible legal action arising from improper use of this Application or the related Services.

The User declares to be aware that the Owner may be required to reveal personal data upon request of public authorities.

Additional information about User's Personal Data

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

System logs and maintenance

For operation and maintenance purposes, this Application and any third-party services may collect files that record interaction with this Application (System logs) use other Personal Data (such as the IP Address) for this purpose.

Information not contained in this policy

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time. Please see the contact information at the beginning of this document.

How "Do Not Track" requests are handled

This Application does not support “Do Not Track” requests.

To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Changes to this privacy policy

The Owner reserves the right to make changes to this privacy policy at any time by notifying its Users on this page and possibly within this Application and/or - as far as technically and legally feasible - sending a notice to Users via any contact information available to the Owner. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the User’s consent, the Owner shall collect new consent from the User, where required.

Definitions and legal references

Latest update: August 13, 2021