

Game Privacy Policy



Last updated: April 2026

1. INTRODUCTION

This Game Privacy Policy (this “Policy”) governs how we use personal information about You called “personal data” when You’re playing this game (the “Product”) currently provided or which will be provided by SECRET MODE LIMITED, a company registered in England and Wales with company number 12912552. Our registered office address is Ground And 2nd Floor Imperial House, Holly Walk, Leamington Spa, England, CV32 4JG, or any one of our subsidiaries or affiliated companies (collectively referred to as “our”, “we” or “us”). This is separate to our website’s Privacy Policy, which governs Your use of our website.

We make decisions about how and why we use Your personal data when You use the Product. The means we’re what’s called a “**data controller**” of this personal data.

2. PERSONAL DATA WE COLLECT AND HOW WE COLLECT IT

We process personal data about You when You play our Product, and when You interact with us in relation to our Product. This may include:

- **Information You provide to us and information relating to Your communication**, such information You submit when filling in Your account set up form or contacting our customer support teams.
- **Usage and tracking information**. We automatically collect certain types of usage and device information when You use our Product. This information includes device identifiers (like IP address), country of install, device information (manufacturer, model, platform, operating system), system information (RAM and resolution), application information (app ID), unique device or account ID, usage information, and other similar information.
- **Voice and text communications**. Where voice chat or text chat features are available, we may process voice communications transmitted through our voice chat systems, text messages sent through in-game chat systems, and associated metadata (such as timestamps and participants). Voice and text communications may be processed in real time to enable communication functionality. We do not permanently store voice communications unless required for moderation, abuse prevention, legal compliance, or safety purposes.

In relation to information, You provide us, the provision is optional, but if You choose not to provide it You may not be able to access certain aspects or functionalities of the Product where this information is needed. Where we collect personal data to administer our contract with You or to comply with our legal obligations, this is mandatory, and we will not be able to provide our Product without this information.

We may collect the following categories of personal data in connection Your use of our Product:

- **Identity and contact information**, such as name, email address, mailing address, and phone number, and communication preferences.
- **Account information**, such as username and password and country of residence. You may also optionally provide Your location, preferences, a photo or avatar, or other profile information (but not providing it will not affect Your use of our Product).

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- **Customer support and communications data**, such as Your feedback and interactions with our customer support teams, support ticket and records, and other communications You have with us, including information about in-game communications.
- **Marketing and advertising data**, such as participation in survey responses, contests, sweepstakes, Your marketing choices, information regarding Your preferences or attributes based on Your use of our Product, customer profiles, Your email address and inference segments based on Your account and other games You use, Your activity in online forums and communities and Your interactions with advertising and marketing communications.
- **Usage, browsing and activity information:** such as Your Product activities and device, including IP address, location information, country of install and language, device ID, manufacturer, and model.
- **Gameplay data**, whilst this does not constitute Personal Data, we may collect Your gameplay data including information about events in the Product including progress, costumes selected, player deaths, mods used, time played, achievements, occurrence of particular events, Product installation/uninstallation, play session durations, choices/selections for different parts of the Product, game-play statistics, scores, rankings, click paths, game profile, preferences and friends, and interactions with game content.

3. THIRD PARTY SOURCES

We may collect personal information about You from the following third parties:

- **Connected services:** If You link, connect, or log in using third-party accounts to Your account with us, or interact with us and others on game forums with third-party platforms, the third-party service sends us information such as Your profile information, account details, device IDs, UIDs, MAC address and IP address from that service. This information varies and is controlled by that service or as authorised by You via Your privacy settings at the service.
- **Third party tools:** We also may use third-party tools to help us manage and analyse our social media presence, provide behavioural analytics, report on comments, mentions and other content that is posted about us on social media and other third party sites, platforms, public channels and forums. The information collection and sharing practices of these third parties are subject to their respective terms and conditions and privacy policies.
- **Advertising partners and social media service providers:** We collect information from advertising partners in connection with our ad campaigns that have surfaced on other platforms, such as the ads You clicked on and other interactions with our ads. When You communicate or interact with us, our pages or brand on social media websites and online forums, we collect information about Your communication or interaction from social media companies and other service providers in order to provide us analytics in relation to our social media pages and presence and help us respond to comments, mentions, and other content posted on our pages.
- **Market research and sweepstake vendors:** When You participate in research, we obtain information that You provide our service providers and partners that are assisting us with

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market research from those service providers and partners as well as their analysis in relation to research contributions. When You participate in offers, competitions, contests, sweepstakes or similar that we offer, we collect participation data from service providers and partners that we work with in relation to the offer or competition.

- **Vendors and business partners:** We collect contact, account and payment transaction data from our vendors (such as payment processors, digital storefronts, cloud hosting and service providers) to enable features of our Product.
- **Steam** - We use Steam services (e.g. achievements, cloud saves). For the avoidance of doubt, other than as expressly set out in this Policy, we do not access or process your Steam account data for these purposes. Steam has its own Privacy Policy, and you can review it here: [Steam Privacy Policy](#).

4. HOW AND WHY WE USE YOUR PERSONAL DATA

Depending on where You play our Product, we are only legally allowed to use Your personal data where a “**legal basis**” allows us to do so. These are the legal bases which could apply:

Legal Basis	When does this Legal Basis apply?
“Contract” We need to carry out or sign up to a <u>contract</u>	When it’s necessary to use Your personal data to perform a contract with You, or because You have asked us to do something before signing a contract with You that requires the processing of Your personal data. In these cases, if You don’t provide Your personal data, then we won’t be able to perform the contract or do what You have asked us to do before signing the contract.
“Legitimate Interest” It’s in our or someone else’s “ <u>legitimate interests</u> ”	“Legitimate interests” is a legal phrase. It usually means a commercial or business interest that is important to us or another company, and which we’ve balanced against Your right to privacy. We will always let You know what the interest is, and You can object to us using Your personal data for these reasons via email at info@secretmode.games .
“Consent” You have given us Your <u>consent</u>	Sometimes we will ask for Your (or we might need to ask for Your parent’s) consent to use Your personal data. This consent will always be clear and separated out from other information. You can always withdraw Your consent by contacting us at info@secretmode.games

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“Legal obligation”	
We need to do something a <u>legal obligation</u> tells us to do.	When it’s necessary to use Your personal data so that we can perform our legal and regulatory obligations – so that we don’t break the law.

This table lists the types of personal data we may use about You, and our reason for this:

The types of Your personal data we use	Why we use this personal data	Legal basis
Providing our Product (e.g. identity and contact data, account data, transaction data, (including third-party account IDs), usage and tracking data, and gameplay data).	We use this information to create Your account to provide access to the Product. Where You can login to our Product from a third-party platform, we process account information provided by that third party. We also use this information to host our servers and enable the Product.	Performance of Contract Legitimate interest in maintaining and improving the Product
Providing friends list functionality (e.g. account data, gameplay data).	We use this information so that You can connect with Your friends and share game activities with Your friends.	Performance of Contract
Enabling customer support (e.g. identity and contact data (including email), account data, customer support and communication data, transaction data, and gameplay data)	We use this information to help provide support to You in relation to the issue You’ve contact us about.	Legitimate interest in answering Your questions about our Product to improve Your experience.
Leaderboards (e.g. Steam ID, Steam photo & region (country))	We use this information to provide player level data including show on in-game leaderboards	Legitimate interest in providing the Product.

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The types of Your personal data we use	Why we use this personal data	Legal basis
Running technical diagnostics and crash / bug reporting (e.g. account data, gameplay data, and usage and tracking data including basic hardware information, IP address, operating system information, server logs, log files, and bug/crash reports).	We use this information to conduct and run technical diagnostics and crash reporting or when you report bugs to us. We process some of Your usage and tracking information to accomplish this including device IDs and other technical information necessary to why something went wrong.	Consent (where consent is needed to access information stored on Your device)
Maintaining network security, including account data (e.g Device ID, Steam ID, Player ID, Epic Account ID), and usage and tracking data like IP address and IP lookup information).	We use this information to help provide security and network protection mechanisms,	Legitimate interest in ensuring the security of our Product & technologies
Providing community forums (e.g. Account information including email, IP address, password and alias, and forum postings).	We use this information to allow You to use the forum services.	Performance of Contract
Conducting analytics for gameplay features (e.g. account information, usage and tracking data, gameplay data)	We process data related to Your device and Your gameplay to learn more about our Product.	Consent (where consent is needed to access information stored on Your device).
Conducting behavioural analytics	We track behavioural analytics based on player activities,	Legitimate interests in improving our Product

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The types of Your personal data we use	Why we use this personal data	Legal basis
(e.g. Steam ID, Player ID, IP address, country) Improving our Product (e.g. account information, usage and tracking data, customer support and communication data, gameplay data, Steam ID, Player ID, IP address, country of origin).	technical performance, ads channel. We process information provided from Your feedback and analytics of our users gameplay to optimize our Product, fix patches and bugs, offer upgrades, facilitate software updates, and develop new games, features, offerings, and services	Legitimate interests in improving our Product
Sending our newsletter (e.g. including identity and contact data like name and email).	We use this information to send You our subscription newsletter.	Consent
Measuring ad campaigns (e.g. identity and contact details, account information, tracking and usage data, marketing data and advertising data).	We process this data to measure the effectiveness of ads shown to You. For example, if You click on a link that advertises the Product, we store the Advertising ID for that advertisement with Your profile.	Consent
Protecting and enforcing our rights where relevant, (e.g. identity and contact data, account data, transaction data, customer support and communication data, marketing data and advertising data, gameplay data).	We may process personal data to protect and enforce the rights, property, security or safety of us, our business, our customers or others, including investigating and helping to prevent fraud or other unlawful activity. We keep business, accounting and legal records to do this.	Legitimate interests in defending our legal rights and interests.
Meeting regulatory requests (e.g. potentially all information categories listed above).	We may disclose personal data to meet requests from regulatory, prosecuting, law enforcement, tax or	Legitimate interests – defending our legal rights and interests.

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The types of Your personal data we use	Why we use this personal data	Legal basis
Responding to data subject requests where relevant (e.g. identity and contact data, account data, transaction data, customer support and communication data, marketing data and advertising data). Sending legal reports/responding to court orders (e.g. potentially all information categories listed above if a law enforcement body requests it).	governmental authorities, courts or tribunals If a data subject request is submitted, we use this information to confirm the requestor's identity, Your rights and to process the request. We may be required by law to disclose this information to law enforcement bodies.	Legal obligation – our obligations under data protection laws Legal obligation – our obligations under tax, anti-money laundering, anti-bribery, security, and intelligence laws
Financial reporting (e.g. transaction data, usage and tracking data).	We use this information to complete our financial reporting and disclosure obligations to parent company, tax agencies and regulators	Legal obligation – our obligations under tax and corporate law.

5. DISCLOSURES OF YOUR PERSONAL DATA

Sometimes we share Your personal data with other companies and organizations.

The types of companies and organizations we share Your personal data with are as follows:

- **Game storefronts, platforms and distributors** – Where necessary to provide our Services or to investigate or prevent fraud, we share Your identity and contact, account, and gameplay data with other companies (including any third party platform provider like Steam, Xbox or Sony) to provide the Product or assist You in setting up Your account.
- **Companies in our “group” of companies** – We have lots of different companies in our “group” who are linked to us. Some of them provide us with services to help us to manage our Product. When needed, we share all personal data mentioned above with these other companies so they can assist us with the processing set forth in this policy.

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- **Service providers** – We need separate companies to provide us with services we use to support the Product. We share personal data with the following categories of third parties: payment processors and online store providers (we share Your identity and contact and account data); hosting providers (we share Your account data, and device usage and tracking data, account ID, account photo & region/country); customer support companies (we share Your identity and contact data, customer support and communications data, and gameplay data); technical support providers (we share technical diagnostics information contained in Your usage and tracking data, and gameplay data); newsletter providers (we share Your identify and contact data); and offline support services such as Product support or data storage (we share Your account data, and device usage and tracking data, Steam ID, Steam photo & region/country).
- **Advertising and analytics partners** – We engage third parties that provide advertising, campaign measurement, online and mobile analytics and related services to us as described above. We share identity and contact information, marketing and advertising data, and usage and tracking data with these providers.
- **Regulators, official authorities, and other third parties in relation to legal compliance** – For example, the police or the government might legally require use to give them personal data to help them with an investigation, or we might be required to give these companies personal data to enforce our terms, address security and fraud, and to protect You. We may be required to share all categories of personal data mentioned above with these entities.
- **A third party that acquires all or part of our business** – we might disclose all categories of Your personal data mentioned above to another company which buys or undertakes another type of corporate transaction in respect of our shares or buys all or part of our assets.
- **With Your consent** – we share information about You for any other purposes disclosed to You with Your consent.

6. WHERE WE SHARE YOUR PERSONAL DATA

Sometimes Your personal data goes to other countries as part of using Your personal data in the ways we listed above, including in the European Economic Area (“EEA”). If You are in the UK, the EEA, or Switzerland (“European Region”) and Your personal data goes outside of these countries, the law requires us to take extra steps to make sure Your personal data is protected in the place it is going to.

We may transfer Your personal data to third parties that host or access personal data outside of the European Region, including the **United States, Singapore, and China**.

Where the country outside the European Region is a country which is subject to an adequacy decision by the European Commission, UK Government, or the Swiss Federal Council, we rely on that adequacy decision of the transfer – for example the United States (when recipients are certified under the EU-US Data Protection Framework).

If we send Your personal data to a company (either in our “group” of companies or a separate company) which is in a jurisdiction not subject to an adequacy decision, we will rely on EU standard contractual clauses, which require that company to protect Your personal data. To the

extent required or permitted by data protection law, we may rely on a vendor's processor binding corporate rules and/or other data transfer mechanisms available under EU data protection law.

We might take similar steps where You are in another country with similar legal requirements, as well. If You want to find out more information about international transfers, You can contact us using the details below.

7. HOW LONG WE RETAIN YOUR PERSONAL DATA?

We only keep Your personal data for as long as is necessary to fulfil the purpose for which it was collected. As soon as Your data is no longer required for the aforementioned purposes it will be deleted. Generally, we will retain data necessary to provide our Product until we sunset it. Any additional data related to providing our Product, including troubleshooting and customer service, will be kept as long as necessary to fulfil the request.

We might need to keep Your personal data for longer if a law requires us to (for example, laws about record-keeping and tax). Normally this is about six to ten years. If we are keeping Your personal data for longer in this way, we will make sure it is secure and You can still change what we do with it (see below).

8. YOUR DATA SUBJECT RIGHTS

Because Your personal data is about You, You should be able to control what happens to it.

We provide different ways You can do this. The easiest way is to write us an email at info@secretmode.games requesting one or more of the following:

- **“Right to Object”** – You can object to how we are using Your personal data if we are using it based on legitimate interests (see above) in certain situations.
- **“Right to Portability”** – You can request a downloadable copy of Your personal data and for us to transfer it to another party. If You wish for us to transfer such personal information to a third party, please ensure You detail that party in Your request. Note that we can only do so where it is technically feasible.
- **“Right to Access”** – You can request to access to the personal data we use about You, and information about how we use it and who we share it with.
- **“Right to Deletion”** – You can request that Your account or specific personal data we store about You is deleted from the Product. Please be aware that once an account has been deleted there is no way to recover it.
- **“Right to Correct”** – You can request that information about You that is wrong or outdated is corrected.
- **“Right to Restrict”** – You can request to restrict the use Your personal data, for example to storage purposes only.
- **“Right to Withdraw Consent”** – You can withdraw Your consent if our reason for using Your personal data is consent (see above). We will then stop using Your personal data in this way (though this doesn't affect the lawfulness of the processing until You withdraw).
- **“Right to Non-Discrimination”** - we will not discriminate against you for exercising your privacy rights.

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You can also submit requests to exercise these rights by contacting us at info@secretmode.games.

Unfortunately, we're sometimes not able to do the things You tell us to, for example because of the legal basis we have been relying on to process Your personal data, or because it would interfere with another person's own privacy rights. If this happens, we'll explain to You why we aren't able to do what You tell us to with that piece of personal data.

We may also be required to keep certain personal data to satisfy legal requirements or for security purposes, or if there are valid grounds under data protection laws for us to do so (for example, for the defence of legal claims or freedom of expression) but we will let You know if that is the case.

If you are an EEA citizen:

You can contact the official organization which regulates personal data in Your country (the "regulator") to lodge a complaint, if You think we are not using Your personal data correctly. If You are in the UK or the EEA:

- You can find a list of EEA data protection regulators [here](#).
- In the UK, the regulator is the Information Commissioner's Office which You can contact [here](#).
- In Switzerland, the regulator is the Federal Data Protection and Information Commissioner (FDPIC), which You can contact [here](#).

If you are a US citizen:

- Certain U.S. states, including California, Virginia, Colorado, Connecticut, and Utah, provide additional privacy rights to their residents.
- If you reside in one of these states, you may exercise your additional rights as described above, subject to applicable legal requirements and limitations.
- If you have a complaint about how we have handled your personal data, please contact the FTC or State Attorney General as appropriate. For Californian citizens, you may also visit the California Attorney General's website for additional information: <https://oag.ca.gov/privacy/ccpa>.

9. UPDATES TO THIS POLICY

We may make updates to this policy from time to time (for example because our Product has changed or because of changes in laws). We will appropriately notify You of this. The date this Policy was last updated can be found at the top.

10. CHILDREN

We do not use the Services to knowingly solicit data from or market to children under the age of 13. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at info@secretmode.games. We will delete such information within a reasonable time.

11. CONTACT US

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If You have any questions about what we have said in this Policy or how Your personal data is used, You can contact us about it.

Our contact details are: Ground And 2nd Floor Imperial House, Holly Walk, Leamington Spa, England, CV32 4JG and our email address is info@secretmode.games