

## **Two Wolves Studio - Privacy Policy**

Date Effective: September 29th, 2023

Two Wolves Studio (herein referred to as “TWS”, “Genie Gym”, “we,” and “our”) is the owner and developer of the virtual reality game Genie Gym (herein referred to as “GG”).

Our Privacy Policy provides information about the collection, use, disclosure, sharing and storage of your information. Our main goal with the collection of this information is to enhance and improve the overall GG experience. GG is intended for use “as is” and is provided as a service of TWS. TWS serves as the data controller for GG. By using our Service, you agree to the collection and usage of your data and information in accordance with this Privacy Policy. Further, TWS agrees to and abides by the terms set forth by Oculus for Developer Data Use, which can be found at <https://developer.oculus.com/policy/data-use/>

### **Interpretation and Definitions**

The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at the TWS website.

### **Collection of Data**

When choosing to use Our Service, we may collect certain information. This information includes both personal and usage data and may contain information such as, but not limited to:

- Your device internet protocol address
- Device name and device identification
- In-game preferences and settings
- Operating system version and information
- Game configuration
- Time, date, and length of service usage
- Cookies
- Other diagnostic data

### **Use of Data**

TWS may use the data collected for the following purposes:

- To facilitate, monitor, analyze and maintain our Service
- To conduct quality control and assurance activities and testing
- To enhance, improve or update the user experience
- To conduct marketing, research and development activities
- For contractual purposes with our vendors or other third-parties that assist or enhance the provision of our Service
- For other purposes, such as, but not limited to: enforcement of policies, compliance with legal and contractual obligations, developing new products or additional services, etc.

TWS may share data:

- With vendors, contractors or other third-parties that assist or enhance the provision of our Service. This allows third parties to perform tasks at the request of and/or on behalf of TWS
- With other in-game users, such as profile pictures, in-game handles or names and general game statistics and data.
- In order to comply with a legal obligation or court order

## **Retention / Deletion of Data**

TWS will retain data only for as long as is necessary for the purposes set out in this Privacy Policy and to the extent necessary to successfully comply with any legal contracts or obligations.

Further, TWS will respond to all end user requests, as appropriate under applicable law. This includes the deletion of User Data when requested. If you wish to have your User Data deleted, you may email [developer@twowolvesstudio.com](mailto:developer@twowolvesstudio.com). Requests will be processed within 14 business days. Requests must include the end user's information – such as username/Oculus name – so that data can be identified and deleted.

Within 14 business days of TWS receiving notification that an end user no longer has an account, TWS will either delete the user data or obscure, or de-identify the data so that it cannot be associated with a particular user, browser or device.

## **Data Security**

TWS values the data that we receive and has undertaken steps to ensure the security of the data. This includes requiring our contractors and vendors to install appropriate safeguards. Unfortunately, no system is completely secure from security breaches or failures. TWS does not accept liability for unauthorized disclosure of information.

## **Minors**

We do not knowingly collect information from children. Our Service is not directed at children under the age of 13 (or other age if required by local law). If TWS is informed, in writing, that we have received data from a child under the age of 13 (or other age if required by local law), then TWS will immediately delete the data. Likewise, parents/guardians are encouraged to contact us if concerns exist. Contact information can be found at the bottom of this document.

## **Links to Other Websites**

From time to time, our Service may contain links to other websites that are not operated nor controlled by TWS. TWS does not assume any control nor responsibility over these third-party websites.

## **Changes to this Privacy Policy**

We reserve the right to update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us by email at [developer@twowolvesstudio.com](mailto:developer@twowolvesstudio.com).