

# Privacy Policy

## Your Data in Safe Orbit

Last Updated: November 23, 2024

Welcome to Cosmo Crafter's Privacy Policy. Your privacy is important to us, and this document explains how we collect, use, store, and protect your personal information. By accessing or using our Services, you agree to the practices described in this policy.

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# 1. Introduction

## 1.1 Scope of Policy

- This Privacy Policy applies to all data collected through the Cosmo Crafter game, website, and related platforms (collectively, the “Services”).

## 1.2 Commitment to Privacy

- We are committed to safeguarding your personal information and complying with applicable privacy laws, including the General Data Protection Regulation (GDPR) for EU users and other regional privacy frameworks.

## 1.3 Data Controller

- The entity responsible for the processing of your personal data is:  
**João Morais**  
**joao[at]cosmocrafter.net**

## 1.4 Changes to Policy

- We may update this Privacy Policy from time to time. Material changes will be communicated via email or in-game notifications. Continued use of the Services after such changes constitutes acceptance of the updated policy.

## 1.5 Contact for Privacy Concerns

- For questions or concerns about this policy or your personal data, please contact us at **joao[at]cosmocrafter.net**.

# 2. Data We Collect

We collect various types of information to provide, enhance, and secure the Services. Below is an overview of the data categories:

## 2.1 Personal Information Provided by You

- **Account Information:** When you register, we collect details such as your username, email address, and password.
- **Payment Information:** For in-game purchases, we collect billing information such as payment methods and transaction details (handled securely by third-party payment processors).
- **Profile Information:** If you choose to customize your profile, we may collect optional information like avatars, bio descriptions and links to social media.

## 2.2 Automatically Collected Information

- **Usage Data:** We gather data on how you interact with the Services, including gameplay statistics, login timestamps, in-game activities, and feature usage.
- **Device Information:** We collect data such as IP address, browser type, operating system, device ID, and hardware specifications to optimize the game for your setup.
- **Cookies and Tracking Technologies:** We use cookies, web beacons, and similar technologies to monitor session activity and preferences.

## 2.3 Data from Third Parties

- **Social Media or Platform Login:** If you sign in through third-party platforms (e.g., Google, Facebook), we collect basic account information shared by the provider.
- **Third-Party Analytics:** We utilize analytics tools to understand user behavior and improve the Services.

## 2.4 Sensitive Information

- We do not intentionally collect sensitive information (e.g., health data, political affiliations). If you voluntarily share such data through gameplay or community platforms, it is at your discretion.

## 2.5 Child Data

- We do not knowingly collect data from children under the age of 13 without verifiable parental consent, as required by law.

# 3. How We Use Your Data

We use the data we collect to deliver and improve the Cosmo Crafter experience while ensuring compliance with legal obligations. Below is an outline of how your data is utilized:

## 3.1 Providing the Services

- To create and manage your account, including authentication and account recovery.
- To enable gameplay features, in-game transactions, and progression tracking.
- To process payments and deliver purchased virtual goods or subscriptions.

## 3.2 Improving and Optimizing

- To analyze user behavior and preferences to refine game mechanics, user interfaces, and overall performance.
- To debug, test, and troubleshoot technical issues affecting gameplay.
- To personalize your experience, such as displaying tailored recommendations or rewards.

## 3.3 Communicating with You

- To send essential communications, including game updates, feature announcements, and security alerts.
- To respond to support inquiries or feedback.
- To notify you about in-game activities, promotions, or events (you may opt-out of non-essential communications in the Notification Settings).

## 3.4 Ensuring Safety and Security

- To detect and prevent fraud, cheating, unauthorized access, or other violations of our Terms of Service.
- To enforce our policies and protect user accounts and data.

## 3.5 Legal Compliance

- To comply with legal obligations, such as tax reporting, user consent management, or responding to lawful requests by authorities.

## 3.6 Aggregated and Anonymized Data

- To generate aggregated reports and insights that do not identify individual users, used for research, marketing, and development purposes.

# 4. How We Share Your Data

We take your privacy seriously and only share your data in limited circumstances, as outlined below:

## 4.1 With Service Providers

- We share data with trusted third-party service providers who assist in delivering the Services, such as:
  - Payment processors for handling transactions (Stripe).
  - Cloud hosting providers to store and manage game data.
  - Analytics platforms to monitor and optimize gameplay experiences.
- These providers are bound by strict confidentiality agreements and may only use your data as directed by us.

## 4.2 With Other Users

- Certain data, such as your username or in-game profile, may be visible to other players in the game.
- Player interactions, such as leaderboard rankings or treaty collaborations, may also be shared within the community.

## 4.3 For Legal and Compliance Reasons

- We may disclose your data to law enforcement, government authorities, or other third parties if required to:
  - Comply with legal obligations.
  - Respond to lawful requests, such as court orders or subpoenas.
  - Investigate or prevent fraud, cheating, or violations of our Terms of Service.

## 4.4 In Business Transfers

- In the event of a merger, acquisition, or sale of the Company's assets, your data may be transferred as part of the transaction.
- You will be notified of such events and any changes to data handling practices.

## 4.5 With Your Consent

- We may share your data with third parties if you provide explicit consent, such as integrating with third-party tools or services.

#### **4.6 Aggregated and Anonymized Data**

- Non-identifiable data may be shared with partners, researchers, or advertisers for analytical or promotional purposes.

# 5. Your Data Protection Rights

As a user of Cosmo Crafter, you have specific rights concerning your personal data. Depending on your location, these rights may include:

## 5.1 Access and Portability

- You have the right to request access to the personal data we hold about you.
  - Upon request, we will provide your data in a structured, commonly used, and machine-readable format.

## 5.2 Correction and Updates

- You have the right to request corrections or updates to inaccurate or incomplete personal data.

## 5.3 Erasure (“Right to Be Forgotten”)

- You can request that we delete your personal data, subject to legal or contractual obligations.
- Deleting your account may result in the loss of in-game progress, items, and currency.

## 5.4 Objection to Processing

- You have the right to object to the processing of your personal data for direct marketing or other purposes, as permitted by applicable laws (these can be configured in the Notification Settings).

## 5.5 Restriction of Processing

- You may request that we temporarily restrict the processing of your personal data under specific circumstances, such as when you contest the data’s accuracy.

## 5.6 Withdrawal of Consent

- If processing your data relies on your consent, you have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before withdrawal.

## 5.7 Filing Complaints

- If you believe we have violated your privacy rights, you have the right to file a complaint with a supervisory authority in your jurisdiction.

## **5.8 Exercising Your Rights**

- To exercise any of these rights, contact us at **joao[at]cosmocrafter.net**.
- We will respond to all requests within the timeframes required by applicable laws.

# 6. Data Retention

## 6.1 Retention Periods

- We retain your personal data only as long as necessary to fulfill the purposes outlined in this Privacy Policy, including providing the Services, complying with legal obligations, resolving disputes, and enforcing our agreements.

## 6.2 Account Data

- Data associated with your account is retained as long as your account is active. If you delete your account or it becomes inactive for an extended period, we will securely delete or anonymize the data, subject to legal or operational requirements.

## 6.3 Transaction Data

- Financial and payment-related data is retained for a period necessary to comply with accounting and tax regulations.

## 6.4 Gameplay Data

- Gameplay data, such as in-game activity and progression, is retained for as long as required to provide the Services or for analytical purposes, in an anonymized format where possible.

## 6.5 Legal Obligations

- Certain data may be retained longer if required by law, such as for regulatory compliance or to address legal claims.

## 6.6 Deletion Requests

- You may request the deletion of your personal data at any time by contacting us at **joao[at]cosmocrafter.net**.
- We will process your request promptly, unless retention is necessary for legal or contractual obligations.

## 6.7 Backup and Archival Data

- Data removed from active systems may remain in backup or archival storage for a limited time before being securely deleted.

# 7. How We Protect Your Data

We take the security of your personal data seriously and implement measures to protect it against unauthorized access, alteration, disclosure, or destruction.

## 7.1 Technical Safeguards

- **Data Encryption:** Personal data is encrypted during transmission using industry-standard encryption protocols (e.g., HTTPS, SSL/TLS).
- **Secure Storage:** Data is stored on secure servers with restricted access and strong security protocols.
- **Firewalls:** Systems are protected by advanced firewalls to prevent unauthorized access.

## 7.2 Administrative Safeguards

- **Access Controls:** Access to personal data is limited to authorized personnel who require it for specific purposes.
- **Training:** Employees undergo regular training on data protection and security best practices.
- **Monitoring:** Systems are monitored for potential breaches, unauthorized access, or unusual activity.

## 7.3 Third-Party Security

- We ensure that all third-party service providers handling your data adhere to strict security and privacy standards through contracts and regular audits.

## 7.4 Incident Response

- In the event of a data breach, we will notify affected users and relevant authorities promptly, as required by applicable laws.

## 7.5 Limitations

- While we take significant steps to secure your data, no system is completely foolproof. You acknowledge and accept that risks associated with data transmission and storage cannot be entirely eliminated.

## 7.6 User Responsibilities

- Protect your account credentials by using strong passwords and avoiding reuse across multiple platforms.
- Notify us immediately if you suspect unauthorized access to your account.

# 8. Cookies and Tracking

Cosmo Crafter uses cookies and similar technologies to enhance your experience and collect information about your interactions with the Services.

## 8.1 What Are Cookies?

- Cookies are small data files stored on your device by your browser. They allow us to recognize you, store your preferences, and improve functionality.

## 8.2 Types of Cookies We Use

- **Essential Cookies:** Required for the operation of the Services, such as managing user authentication and maintaining session integrity.
- **Performance Cookies:** Collect anonymous data about how users interact with the game and website, helping us identify areas for improvement.
- **Functional Cookies:** Enable enhanced features, such as remembering your preferences and personalizing your experience.
- **Advertising Cookies:** Used to deliver relevant ads to you and measure the effectiveness of marketing campaigns (if applicable).

## 8.3 Other Tracking Technologies

- **Web Beacons:** Tiny graphics included in emails or on the website to track user behavior.
- **Local Storage:** Stores data locally on your device for improved performance and offline capabilities.

## 8.4 Managing Cookies

- You can manage or disable cookies through your browser settings. However, doing so may affect the functionality of the Services.
- Some cookies are essential for security and proper operation and cannot be disabled.

## 8.5 Third-Party Cookies

- We may allow third-party service providers, such as analytics or advertising platforms, to place cookies on your device. These providers are subject to their own privacy policies.

## 8.6 Do Not Track (DNT)

- Cosmo Crafter does not currently respond to Do Not Track (DNT) signals from browsers.

# 9. Children's Privacy

## 9.1 Age Restrictions

- The Services are not intended for children under the age of 13 (or the minimum age required by local laws).
- If you are under the age of 13, you must not use or access the Services without verifiable parental consent.

## 9.2 Parental Consent

- For children under the age of 18 (or the age of majority in their jurisdiction), parental or guardian consent may be required to use certain features of the Services.

## 9.3 Data Collection for Minors

- We do not knowingly collect personal data from children under 13 without parental consent. If we become aware that we have inadvertently collected data from a child without proper authorization, we will promptly delete the data.

## 9.4 Parental Controls

- Parents and guardians can contact us at **joao[at]cosmocrafter.net** to request access, deletion, or modifications to the data associated with their child's account.

## 9.5 Third-Party Compliance

- Any third-party services integrated into the game must comply with our strict policies regarding children's data and applicable laws, such as the Children's Online Privacy Protection Act (COPPA).

# 10. International Users

## 10.1 Data Transfers

- The Services are operated from servers located in **The Netherlands**. If you are accessing the Services from outside this country, your data may be transferred to, processed, and stored in a different jurisdiction.
- By using the Services, you consent to the transfer of your data to countries that may not have the same data protection laws as your jurisdiction.

## 10.2 Compliance with Local Laws

- It is your responsibility to ensure that your use of the Services complies with the laws of your country or region.

## 10.3 GDPR Compliance

- If you are a resident of the European Economic Area (EEA), you have additional rights under the General Data Protection Regulation (GDPR), including:
  - The right to access, correct, or delete your data.
  - The right to data portability.
  - The right to object to certain processing activities.
- To exercise these rights, contact us at **joao[at]cosmocrafter.net**.

## 10.4 Cross-Border Data Safeguards

- We implement appropriate safeguards, such as Standard Contractual Clauses (SCCs), to ensure the security and privacy of your data during international transfers.

# 11. Updates to the Privacy Policy

## 11.1 Right to Update

- We reserve the right to modify this Privacy Policy at any time to reflect changes in our practices, legal requirements, or other operational needs.

## 11.2 Notification of Changes

- Material changes to the Privacy Policy will be communicated to you through reasonable means, such as:
  - Notifications within the game, on our website or through Discord.
  - Email communication to registered users.

## 11.3 Effective Date

- The “Last Updated” date at the top of this Privacy Policy indicates when the most recent changes were made.
- Continued use of the Services after updates to the Privacy Policy constitutes acceptance of the revised terms.

## 11.4 Review of Policy

- We encourage you to periodically review this Privacy Policy to stay informed about how your data is being protected and used.

# 12. Contact Information

For any questions, concerns, or feedback regarding this Privacy Policy, please contact us at:

- **Email:** joao[at]cosmocrafter.net