

Annex 1. Privacy Policy.

Privacy Policy

We invite you to read the document below on how we process personal data and protect privacy.

This document is valid from 08/02/2024.

What is GDPR?

- GDPR is a commonly used abbreviation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (hereinafter referred to as General Data Protection Regulation).
- GDPR, outlays not only for information obligations and obligations related to the security of data processing, but also indicates what rights you are entitled to. This document presents information on how we process your personal data.

Who is the data controller of your personal data?

- The data controller is Michał Majka Neurogrine, ul. Armii Krajowej 7/14, 30-150 Kraków, NIP 6772308416, REGON 369467404 .
- If you have any questions, please contact us by e-mail: michael[at]lexogriner.com

How do we obtain your personal data and who is the recipient?

- We obtain personal data directly from you.
- Recipients of data may only be authorized employees or our associates who provide services related to customer service or IT services or accounting or legal services. The scope of access to data is regulated on the basis of appropriate authorizations or entrustment agreements.

What data do we process, why and for how long?

- We process personal data such as: name, surname, address, VAT ID (in the case of companies) for the purposes of invoicing. The data is processed on the basis of Article 6 (1) (b) of the GDPR (contract performance). The data is processed from the moment you provide it, for the entire duration of the Agreement, and after its completion for a period of 5 years or longer if required by tax regulations in the field of keeping accounting and accounting records.
- We process personal data such as: name, surname, e-mail address for the purposes of creating an Account and maintaining it, including providing the Service. The data is processed on the basis Article 6 (1) (b) of the GDPR (contract performance). The data is processed from the moment you provide it, for the entire duration of

the Agreement, and after its termination for the period necessary to establish, assert or defend legal claims specified by law.

- We process personal data such as: name, surname, e-mail address, telephone number and other data that you provide to us about yourself for the purposes of handling complaints / notifications / complaints. The data is processed on the basis of Article 6 (1) (f) of the GDPR. The legitimate interest of the data controller consists in the possibility of considering reports regarding the operation of the Services or problems with their provision or reports of violations made by Users. The data is processed from the moment you provide it, for the time necessary to handle the process, and after completion of the service, the data is archived for the time necessary to establish, assert or defend legal claims.
- The data on the User's session includes a random sequence of characters (ID), thanks to which the Service Provider can verify the number of logins. We do it because, depending on the active Plan, the User may have a certain number of active devices at the same time. The Service Provider does not collect any information about the User's device in this way.
- Data collected as part of Cloud Storage are processed for the purpose of providing the Service (Article 6 (1) (b) of the GDPR), provided that the User has purchased a Plan that supports this functionality. The data is processed from the moment the functionality starts working for the entire period of using this functionality, and after the end of the paid Plan under which this functionality is available, the data is deleted. The data is not backed up and cannot be restored. For more information on data scope, please see the "Cloud Storage" section below.
- Data collected as part of telemetric are processed for the purpose of providing the Service (Article 6 (1) (b) of the GDPR. The data is collected from the moment of registration in the Service and is processed within 30 days from the date of changing the settings by the User. Detailed information on what data is processed can be found in the Telemetry section.
- Data collected as part of analytics are processed for the purpose of providing the Service (Article 6 (1) (b) of the GDPR. The data is collected from the moment of registration in the Service and is processed up to 2 years from the date of deleting the Account for the purposes of establishing, pursuing or defending legal claims. Detailed information on what data is processed can be found in the Analytics section.

What are your rights?

- Each data subject has the right to access their personal data, rectify them, delete or limit processing, including the right to object to the processing, as well as the right to transfer data and lodge a complaint with the supervisory authority.

Is the data transferred outside the European Economic Area?

- Yes. We use tools such as: Google Analytics, Google Tag Manager, Google Ads, Facebook Ads, Facebook Pixel,

Twitter Website Tag. These tools collect data as described in the " Cookies " section below. These tools are provided by companies represented in the European Union. Both Google, Facebook and Twitter are companies based in the United States of America. All data is processed by tools provided by each of these companies on the terms set out in detail in their privacy policies. You can customize the operation of the tools, including disabling their support.

- For security reasons, the data is hosted on servers in a company with numerous certificates, which has its representative office in the European Union (the company with its parent company headquarters in the United States of America). The data is processed by this company only within the scope of the entrustment agreement concluded with the Service Provider and this company has no right to perform any other operations on the data.

Cookies

Cookies are small text files stored by your web browser when using the Website. There are also other technologies that can be used for similar purposes, such as embedded scripts. The rules for the use of cookies by the Service Provider are described below:

- Cookies
 - Technical cookie to identify the session (PHPSESSID). The connection of WebSockets with the server is established by itself without data exchange, using the same cookie.
- Analytical cookies :
 - Google Analytics: allows you to process information about the sources of visits to the Websites (e.g. location information, including data on free traffic, paid search results, or traffic from display ads) or data on user behavior (e.g. click-throughs on specific subpages / tabs) and other similar ones for analytical purposes. More information: <https://policies.google.com/privacy?hl=pl>
 - Google Tag Manager: it is a tool that helps you control used code snippets, and tags on the Services used analytics Google Analytics.
- Advertising cookies :
 - Google Ads: Google advertising system that allows you to display sponsored links in the search results of the Google search engine and on websites cooperating with the Google AdSense program. More information: <https://policies.google.com/privacy?hl=pl>
 - Facebook Ads and Facebook Pixel: Tools used for advertising on Facebook. A person visiting the Website, after logging in to their Facebook account, sees advertisements for the Website or services related to the Website. More information: <https://www.facebook.com/privacy/explanation>
 - Twitter Website Tag: used for advertising on Twitter. A person visiting the Website, after logging in to their Twitter account, sees advertisements of the Website or services related to the Website. More information: <https://business.twitter.com/en/help/campaign-measurement-and-analytics/conversion-tracking-for-websites.html>

Cloud Storage

- The functionality is available under the Personal, Professional, and Enterprise Plan and under the Free plan with the limitation to upload only HUDs and Overlays.
- The functionality is based on the possibility of hosting some of the data from LHM.gg (e.g. matches, players, tournaments) in the cloud.
- Data is automatically downloaded and synchronized.
- State of the game launch parameter toggles.
- Exact data list:
 - List of players:
 - ID (internal)
 - First and last name
 - Displayed nickname
 - Country
 - Assigned Team
 - SteamID / In-game name
 - Photo
 - Any additional information that the user may attach separately
 - Teams list:
 - Name
 - Logo / Photo
 - Short Name
 - Country
 - Any additional information that the user may attach separately
 - Matches list:
 - Participating teams,
 - Result of the whole match (series),
 - Selection process maps (the so-called veto) - who selected / removed which map from the pool and on which side who started,
 - Score per map
 - Match date,
 - Match status (scheduled, in progress, completed),
 - Match history (delta data from specific intervals, e.g. per round)
 - Any additional information that the user may attach separately
 - Tournaments List:
 - Name
 - Logo
 - Group stage and playoff format (swiss/bracket),
 - Roster participating teams,
 - List of matches and their results
 - Any additional information that the user may attach separately
- HUDs (visual layer for broadcast purposes)
- Configuration of the application and some functionalities
- AR modules
- Addons
- ACO (zone boundaries per map, list of configuration commands for each zone)
- Cameras:
 - list of players,

- ID players and players' IP addresses for WebRTC connection (we don't keep it in the database, only in memory as long as they exist for use)
- Enterprise Plan:
 - Names of workspaces,
 - Lists of their users and permissions,
 - List of users added or invited to Enterprise plan.

Telemetry

- Data is automatically downloaded and synchronized.
- Exact data list:
 - Information about the game used by the User,
 - team name,
 - team logo,
 - country of the team,
 - team score,
 - username, first name, surname, steamid, country, photo of the players followed by the players,
 - name of games watched by the User
 - LHM version
 - Unique machine ID
 - Name of used HUD

Analytics

- Data is automatically downloaded and synchronized.
- Data that is processed
 - Number of openings of individual application screens in a given account (e.g. user X opened the Players tab 33 times),
 - Order of openings of individual application screens,
 - Number of sessions on a given day - number and timestamp (date + time) launching the application and modules of a specific game,
 - Logging in on a new device (each device receives an individual ID, to log the fact that the user was logged in one day on PC X and the next day on PC Y - each login activates the session limit, e.g. for the Personal plan the user can log in on only one device and the limit is deleted automatically after 12h - it is not possible to reset it manually by user),
 - MachineGuid,
 - Plan purchase (timestamp, plan type, was it an upgrade),
 - Changing the company data assigned to the user (timestamp, new data companies),
 - File upload to Cloud Storage (timestamp, randomly generated file ID),
 - Deleting the file from Cloud Storage (timestamp, randomly generated file ID),
 - Invoicing (timestamp, all invoice details),
 - Plan cancellation (timestamp, cancellation reason <admin, automatically or by user>),
 - Logging into the application or the LHM Website (timestamp),
 - User registration (timestamp),
 - Deleting the Account by the User (timestamp),

- Acceptance of the Terms of Service by the User (timestamp),
- Initiation of the password reset process by the User (timestamp),
- Password reset by User (timestamp),
- Managing workspaces in the enterprise plan (timestamp, action type <add, delete, edit, add user, delete User, change permissions>, workspace name set by the User),
- Purchase of additional seats for the Enterprise Plan (timestamp, number of seats),
- Assigning a new User to the Enterprise plan (timestamp),
- Failure in the application or on the server side as a result of the action of User (timestamp, error information)
- Language of the application
- Scout usage (time spent using Scout Vision and Scout Predict, number of Scout calls, in case of a kill during a match: ids of the killer, victim, and player selected by Scout, played map, and timestamp)
- HUDs, Premium HUDs, and Ultra HUDs usage (time spent using, timestamp, game, and used color theme)
- Unique machine ID