

The protection of your personal data is of highest importance to LP ES PLC and therefore you will find the following information in our privacy policy:

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## I. General Information

For any queries regarding data protection, you can always contact our data controller or our data protection officer.

### 1. Name and Address of the Data Controller

Data controller in terms of the General Data Protection Regulation (GDPR), as well as the Spanish Data Protection Act (Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales).

LP ES PLC  
189/1 The Strand  
Gzira 1027  
Malta

Phone.: +356 9944 8600  
E-Mail: [info@lowen-play.es](mailto:info@lowen-play.es)

### 2. Contact Information of the Data Protection Officer

For questions about data protection, for requests and / or for further information about data processing at LP ES PLC, please contact our data protection officer:

LP ES PLC  
Delegado de Protección de Datos  
189/1 The Strand  
Gzira 1027  
Malta  
E-Mail: [dpo@lowen-play.es](mailto:dpo@lowen-play.es)

### 3. Supervisory Authority

If you believe that the processing of your personal data by LP ES PLC has not been carried out properly, you have the right to contact a supervisory authority in the Member State of your habitual residence, your place of work or the place of the alleged infringement. The competent supervisory authority according to Art. 55 GDPR is ...

Office of the Data Protection Commissioner  
Data Protection Commissioner: Mr Joseph Ebejer  
2, Airways House  
High Street, Sliema SLM 1549  
Tel. +356 2328 7100  
Fax +356 2328 7198  
e-mail: [commissioner.dataprotection@gov.mt](mailto:commissioner.dataprotection@gov.mt)  
Website: <http://www.dataprotection.gov.mt/>

## II. General Information on Data Processing

### 1. General Information on Data Processing and Application

As a matter of principle, LP ES PLC processes your personal data only in order to be able to present contents and services for a functioning website. Your personal data is collected when you create an account with us. This privacy policy applies to all pages of our online offer.

### 2. Definitions

#### a) Definitions according to Art. 4 GDPR:

- Personal data: any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, a location data, an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Examples are contact data, communication data, billing data.
- Processing: any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organisation, filing, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- Data controller: the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or national law, provision may be made for the controller or for the specific criteria for his designation under Union or national law.
- Recipient: a natural or legal person, public authority, agency or other body to whom personal data are disclosed, whether or not that person is a third party.
- Third party - a natural or legal person, public authority, agency or other body, other than the data subject, the controller, the processor and the persons who, under the direct authority of the controller or the processor, are authorized to process the personal data.
- Profiling: any automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person. In particular, to analyse or predict aspects relating to the job performance, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.
- Restriction of processing: the marking of stored personal data with the aim of restricting your future processing.

#### b) „Need-to-Know-Principle“:

- Every data-processing employee should be able to access only those data sets and execute programs that he really needs for his task.

### 3. Legal Basis for the Processing of Your Data

The legal basis for the processing of your personal data results from Art. 6 (1) of the GDPR. Processing of such data shall be lawful only if and to the extent that at least one of the following applies:

- a) In the event that your consent is required for the processing of your personal data, this results from Art. 6 (1)(a) of the GDPR.
- b) If the processing of your personal data is necessary for the fulfilment of a contract or pre-contractual measures, Art. 6 (1)(b) of the GDPR serves as the legal basis.
- c) Art. 6 (1)(c) of the GDPR is the legal basis for the processing of your personal data to fulfill legal obligations on the part of LP ES PLC.
- d) If the processing is necessary in order to protect your or another natural person's vital interests, Art. 6 (1)(d) of the GDPR is the legal basis,
- e) Art. 6 (1)(e) of the GDPR is relevant when the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in LP ES PLC as controller.
- f) If the processing of personal data is necessary for the purposes of the legitimate interests pursued by LP ES PLC as controller or other third parties, except where such interests are superseded by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, Art. 6 (1)(f) of the GDPR is the legal basis.
  - The existence of legitimate interests may arise in the course of providing the service; starting with direct marketing measures, direct communication with website users, technical support available when needed, credit checks and efforts to prevent or detect abuse of the websites operated by LP ES PLC and/or the services it offers.
  - Furthermore, they can also be used for internal processes such as the handling of administrative activities or the guarantee of the proper operation of the websites.
  - Finally, these also arise from the efforts within the LÖWEN PLAY Group to achieve synergy effects by providing various services centrally.

### 4. Categories of Recipients

- Employees of LP ES PLC according to the "Need to Know" principle
- Group company of LP ES PLC
- Payment provider
- Service providers who support LP ES PLC in website optimization and online marketing as well as in hardware and software
- Social networks (e.g. Facebook)

## 5. Description of the Data and the Purpose of the Processing

In detail it concerns the following data:

- **Data for access management (login information)**  
e.g. e-mail address, password [in encrypted form so that no employee has access to your personal password](but also Facebook ID if you connect your Facebook account)
  - **Purpose:**
  - To use and implement the website and the registered player account.
  - For the purpose of age verification, fraud and money laundering prevention.
  - For the purpose of implementing online payments using financial institutions and/or third-party payment service providers.
  - To provide customer support, regardless of the form of contact chosen (email, telephone, etc.).
  - For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.  
**Legal basis:** Art. 6(1)(b) of the GDPR
  
- **User-Data**  
e.g. your display name, e-mail address
  - **Purpose:**
  - To use and implement the website and the registered player account.
  - For the purpose of age verification, fraud and money laundering prevention.
  - For the purpose of processing online payments through financial institutions and/or third party payment providers.
  - To provide customer support, regardless of the form of contact chosen (email, telephone, etc.).
  - To comply with legal requirements, regulatory obligations or to respond to requests from governmental authorities. Mainly financial law inquiries.
  - To protect the group and the rights of this company, as well as the rights of related parties. Furthermore, the recording and disclosure of data may be necessary to: (a) protect your safety, security and privacy, (b) protect our legal rights, safety, security or property, or (c) minimize our or related parties' risk.
  - Also for your and our safety, to improve the services and functionality of the website. This includes surveys, your voluntary feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.
  - For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.
  - For the purpose of carrying out marketing communications of the Group, which are based on voluntary consent or consent to the

transmission of registration data or login data. This can be of a general nature or can be tailored to user behavior and activity data personally tailored to the player. Marketing communications include communication via e-mail, SMS and telephone, or via chat messages, and may include communication via third-party messengers or by post.

- **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR
- **Data about your game progress**  
such as your level, your status in tasks, the amount of game currency you have
  - **Purpose:**
  - For the purpose of implementing online payments using financial institutions and/or third-party payment service providers.
  - To protect the group and the rights of this company, as well as the rights of related parties. Furthermore, the recording and disclosure of data may be necessary to: (a) protect your safety, security and privacy, (b) protect our legal rights, safety, security or property, or (c) minimize our or related parties' risk.
  - For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.
  - **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR
- **Setting data**  
such as whether you have subscribed to the newsletter, whether you have registered your phone number for SMS communication
  - **Purpose:**
  - Compliance with the terms and conditions for this platform.
  - To comply with legal requirements, regulatory obligations or to respond to requests from governmental authorities. Mainly financial law inquiries.
  - To protect the group and the rights of this company, as well as the rights of related parties. Furthermore, the recording and disclosure of data may be necessary to: (a) protect your safety, security and privacy, (b) protect our legal rights, safety, security or property, or (c) minimize our or related parties' risk.
  - This includes surveys, your voluntary feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.
  - For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.
  - **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR
- **Device data**  
such as device ID, operating system, user agent
  - **Purpose:**
  - Provision of customer support, regardless of the chosen form of contact (e-mail, telephone contact, etc.)
  - Also for your and our safety, to improve the services and functionality of the website. This includes surveys, your voluntary

feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.

- **Legal basis:** Art. 6(1)(b) and (f) of the GDPR
- **Data on your online behavior**  
such as logins, your game, clicks
  - **Purpose:**
    - For the purpose of age verification, fraud and money laundering prevention.
    - To comply with legal requirements, regulatory obligations or to respond to requests from governmental authorities. Mainly financial law inquiries.
  - **Legal basis:** Art. 6(1)(c) and (e) of the GDPR.
- **Data about individual payments in our games**  
as for example when buying our game currency in the store
  - **Purpose:**
    - Compliance with the terms and conditions for this platform.
    - For the purpose of implementing online payments using financial institutions and/or third-party payment service providers.
    - To comply with legal requirements, regulatory obligations or to respond to requests from governmental authorities. Mainly financial law inquiries.
    - To protect the group and the rights of this company, as well as the rights of related parties. Furthermore, the recording and disclosure of data may be necessary to: (a) protect your safety, security and privacy, (b) protect our legal rights, safety, security or property, or (c) minimize our or related parties' risk.
    - For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.
  - **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR
- **Network data**  
such as IP address, referrer
  - **Purpose:**
    - To use and implement the website and the registered player account.
    - For the purpose of implementing online payments using financial institutions and/or third-party payment service providers.
    - To comply with legal requirements, regulatory obligations or to respond to requests from governmental authorities. Mainly financial law inquiries.
    - Also for your and our safety, to improve the services and functionality of the website. This includes surveys, your voluntary feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.
    - For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.
    - For the purpose of carrying out marketing communications of the Group, which are based on voluntary consent or consent to the transmission of registration data or login data. This can be of a



general nature or can be tailored to user behavior and activity data personally tailored to the player. Marketing communications include communication via e-mail, SMS and telephone, or via chat messages, and may include communication via third-party messengers or by post.

- **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR

- **Localization data**

such as country of origin, language

- **Purpose:**
- To use and implement the website and the registered player account.
- For the purpose of implementing online payments using financial institutions and/or third-party payment service providers.
- Provision of customer support, regardless of the chosen form of contact (e-mail traffic, telephone contact, etc.)
- Also for your and our safety, to improve the services and functionality of the website. This includes surveys, your voluntary feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.
- For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.
- **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR

- **Personally identifiable data**

such as address, date of birth

- **Purpose:**
- To use and implement the website and the registered player account.
- For the purpose of age verification, fraud and money laundering prevention.
- Compliance with the terms and conditions for this platform.
- For the purpose of implementing online payments using financial institutions and/or third-party payment service providers.
- Provision of customer support, regardless of the chosen form of contact (e-mail, telephone contact, etc.)
- To comply with legal requirements, regulatory obligations or to respond to requests from governmental authorities. Mainly financial law inquiries.
- To protect the group and the rights of this company, as well as the rights of related parties. Furthermore, the recording and disclosure of data may be necessary to: (a) protect your safety, security and privacy, (b) protect our legal rights, safety, security or property, or (c) minimize our or related parties' risk.
- Also for your and our safety, to improve the services and functionality of the website. This includes surveys, your voluntary feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.
- For the purpose of transferring assets in the event we sell all or part of the company or assets and/or merge.

- For the purpose of carrying out marketing communications of the Group, which are based on voluntary consent or consent to the transmission of registration data or login data. This can be of a general nature or can be tailored to user behavior and activity data personally tailored to the player. Marketing communications include communication via e-mail, SMS and telephone, or via chat messages, and may include communication via third-party messengers or by post.
- **Legal basis:** Art. 6(1)(b), (c) and (f) of the GDPR
- **Partner information**  
such as advertising banners that you clicked on to reach us
  - **Purpose:**
  - Also for your and our safety, to improve the services and functionality of the website. This includes surveys, your voluntary feedback, the transmission of possible malfunctions, training of our employees or of service providers and partners.
  - For the purpose of carrying out marketing communications of the Group, which are based on voluntary consent or consent to the transmission of registration data or login data. This can be of a general nature or can be tailored to user behavior and activity data personally tailored to the player. Marketing communications include communication via e-mail, SMS and telephone, or via chat messages, and may include communication via third-party messengers or by post.
  - **Legal basis:** Art. 6(1)(f) of the GDPR

Collection of this information may include requesting documents and supporting evidence from you, verifying your account, processing deposits or withdrawals, and performing anti-fraud checks (on your own initiative or as required by applicable law). Examples of such documents and receipts are payment receipts, bank statements, tax information, proof of ownership of e-wallets (such as Neteller, Skrill or Paypal), tax identification numbers (NIF / NIE)) in the case of Spanish players, KYC documentation (e.g. identity card, power of attorney, utility bill).

## 6. Duration of Data Storage and Data Deletion

LP ES PLC deletes your personal data as a matter of principle when the purpose for which it was stored no longer exists. The above-mentioned data is obligatory for the use and implementation of the website, as well as the fulfillment of the terms and conditions. It is conceivable, however, that any storage beyond this may result from European or national laws, ordinances or other regulations to which the LP ES PLC is subject. Such data will only be deleted when the corresponding storage periods resulting from the aforementioned legal sources come to an end. The only exception to this is if the stored data is required for the fulfillment of a contract or the conclusion of a

contract. For example, storage periods of up to ten years are legally prescribed for certain data due to tax regulations.

#### 7. Where is the Data Processed?

Your personal data is processed by us exclusively within Europe.

### III. Information on the Required Data Processing and Transmission

#### 1. Group Companies

All collected and personal data is also made available by LP ES PLC to other companies of the LÖWEN PLAY Group.

##### a) Description and Scope of Data Processing

All data which is processed, for example, when visiting the website, registering, ordering newsletters, using a payment provider, etc. and which is mentioned at the appropriate place in this data protection declaration, is also available to other companies of the LP ES PLC for the purposes described below:

##### b) Legal Basis for Data Processing

As we have a legitimate interest in offering you our services comprehensively, continuously and in line with the latest trends, we would have to process your data in accordance with Art. 6(1)(f) of the GDPR.

##### c) Purpose of Data Processing

The website itself and the implemented games are provided through cooperation between LP ES PLC and other companies of the group. For this purpose, it is necessary that all personal data, including data collected by cookies, is always available to all companies within the group. Only in this way is it possible to carry out necessary work, e.g. on the programming code of the website or settings in games, and to adjust them so that they function smoothly for all players. For example, the harvesting of information related to the number of players who are logged in and are active at any point in time, and at what time of day and at what time of night, could be relevant for other companies of the group in order to be able to make adjustments to the current server capacities if necessary. Furthermore, the information about which browser type players prefer to use our offers is also relevant, in order to be able to have programming adjustments made by the corresponding employees in the case of upcoming browser updates.

##### d) Duration of Storage

As soon as data stored at LP ES PLC is to be deleted, the corresponding data stored at other group companies will also be irretrievably removed.

##### e) Possibility of Objection and Removal

In the case of personal data that is processed in connection with Art. 6(1)(a) of the GDPR and thus with the player's consent, a revocation is sufficient to prohibit further processing. In the case of data that is processed in connection with Art. 6(1)(b) of the of the GDPR and thus by contract, the termination of the user contract concluded with LP ES PLC is required to terminate the data processing. In order to terminate the processing of data which is carried out in connection with Art. 6(1)(f) of the GDPR, an objection on the part of the player is necessary which is effective for the future.

## 2. Identification during the Registration Process

### a) Description and Scope of Data Processing

As part of the registration process, LP ES PLC transfers the data to external service providers who, through a comparison with your databases, identify the participants before the game begins.

LP ES PLC cooperates with the following technical service providers:

- Cybot, 1058 Copenhagen
- Cookiebot, 1058 Copenhagen
- European Office, 53-033 Warsaw

### b) Legal Basis for Data Processing

LP ES PLC is obligated to this procedure by, among other things, the Money Laundering Act, so that this processing of the data is necessary, on the one hand, to fulfill a legal obligation in accordance with Art. 6(1)(c) of the GDPR.

On the other hand, they are also part of the necessary pre-contractual measures within the meaning of Art. 6(1)(b) of the same GDPR, which are a prerequisite for using the services of LP ES PLC.

### c) Purpose of Data Processing

The purpose of the processing is to verify the identity of the players, to assess their compliance with the applicable terms and conditions and legal obligations, including those relating to the prevention of money laundering, the financing of terrorism and the protection of minors.

## 3. Hosting of our Website

When you visit the website, certain information is created and stored automatically, as is the case on [lowen-play.es](https://lowen-play.es).

When you visit our website, our web server (computer on which this website is stored) automatically saves data such as

- the address (URL) of the accessed web page
- browser and browser version
- the operating system used
- the address (URL) of the previously visited page (referrer URL)
- the host name and IP address of the device being accessed
- date and time

in files (web server log files).

Usually data in web server log files is deleted at regular intervals - the exact time depends on the configuration rules. These can be time or size based.

We do not pass on this data to third parties, but cannot exclude the possibility that this data may be viewed in the event of unlawful behavior.

#### 4. Facebook-Connect

Instead of direct registration, the services offered on the website can also be used by linking to your Facebook account via Facebook Connect. As soon as you have logged on to our website via Facebook Connect, a connection is automatically established between the Facebook servers and ours and an exchange of data takes place (e.g. Facebook name, user ID or surfing behavior on our website).

For more information about Facebook Connect and the privacy settings, please refer to the Terms of Use and Privacy Policy of Facebook Inc.

#### 5. Payment Providers

##### a) Description and Scope of Data Processing

LP ES PLC works with the following payment providers or payment service providers:

- Adyen N.V., 1011 DJ Amsterdam
- MIR Limited UK Ltd, SS2 6UN Southend
- PayPal (Europe) Sàrl et Cie, L-2449 Luxembourg

##### b) Legal Basis for Data Processing

Art. 6(1)(b) of the GDPR and thus the fulfillment of the contracts existing between you, LP ES PLC and the other listed payment providers or payment service providers, constitute the legal basis for data processing.

##### c) Purpose of Data Processing

It is only possible to make a deposit into your player account on submission of your personal data.

##### d) Duration of Storage

The listed payment providers and/or payment service providers, as well as LP ES PLC, delete your personal data after successful completion of the payment transaction, unless legal obligations provide for a longer retention period.

#### 6. Google Fonts

##### a) Description and Scope of Data Processing

Google Fonts is integrated on the website. When loading them, a connection to the servers of Google is established, whereby the browser of the user visiting the site sends various data to Google. These are, among other things, browser and device data, but also the IP address of the user which represents a personal date.

Consequently, personal data is transmitted to Google's servers in the USA through the integration of Google Fonts.

b) Legal Basis for Data Processing

Our interest in search engine optimization, improved loading times, reduced administrative effort and a uniform presentation across devices serve as a justification to process data as per Art. 6(1)(f) of the GDPR.

c) Purpose of Data Processing

Processing of data is also used to easily and uniformly integrate a large number of fonts on the website. This also helps us to optimise our presentation in order to make our website as user friendly as possible for you..

## IV. Information on the Protection of your Data and your Rights

### 1. Your Rights as a Data Subject

a) **Right of access (Art. 15 GDPR)**

You have the right to be informed whether and which personal data we process from you. In accordance with GDPR, we will provide you with a summary of your personal data on request. In accordance with the GDPR, we have a 30-day period to answer your request for information.

b) **Right of rectification (Art. 16 GDPR)**

If you inform us that data processed by us on your behalf is incorrect or incomplete, we will adjust it immediately after positive verification.

c) **Right of deletion (Art. 17 GDPR)**

We delete personal data immediately upon request, unless none of the reasons stated in Art. 17 GDPR oppose this. Deletion can always only take place for the future.

d) **Right to restrict processing (Art. 18 GDPR)**

If you so wish, we will restrict the processing of your data, provided that one of the conditions mentioned in this regulation is met.

e) **Right of notification (Art. 19 GDPR)**

We inform recipients (e.g. order data processors) of requests for personal data if we have received a request to correct, restrict or delete your personal data.

f) **Right to data portability (Art. 20 GDPR)**

Upon request, we will provide your data in a generally used, machine-readable format and transfer your personal data to another responsible person upon request.

g) **Right to object**

You may also object to the processing of personal data concerning you if this is based on certain legal grounds of legitimacy (e.g. Art. 6(1)(e) or (f) of the GDPR), provided that a reason in the sense of this provision exists.

h) **Right to withdraw the consent (Art. 7 GDPR)**

You have the right to revoke the consent(s) given by you at any time in accordance with Art. 6(1)(a) of the GDPR with effect for the future.

i) **Right in case of an automated decision (Art. 22 GDPR)**

You have the right not to be subject to a decision based solely on automated processing, including profiling.

j) **Right of appeal to supervisory authorities (Art. 77 GDPR)**

If you are of the opinion that the processing of your data violates the provisions of the GDPR or that your data protection rights have otherwise been violated in any way, you can contact your competent data protection authority (see point I 3. above) or another supervisory authority at any time. - An overview of the supervisory authorities in Europe can be found at:

[https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)



## 2. International Data Transmission

In principle, recipients of personal data must be located in the European Union (EU) or the European Economic Area (EEA). The non-EU and non-EEA member Great Britain will be treated as an EU member state on the basis of valid treaties, at least until 31.12.2020. Otherwise, the sending of data to third countries is only permitted if there is an adequacy decision by the EU Commission, standard contract clauses approved by the EU Commission are used, or approved rules of conduct or company rules are involved. Data may be sent to the United States of America (USA) based on an adequacy decision of the EU Commission.

We would like to point out at this point that due to the so-called "Schrems II ruling" (ECJ, 16.07.2020 - C-311/18), data transmission no longer meets the requirements of the GDPR due to the "EU-US Privacy Shield". A legal and/or political solution is currently being worked on at both national and European level. As soon as a solution is found there, we will implement it immediately.

## V. Information about Cookies and Social Media Plugins

Detailed information about the cookies and plugins used on lowen-play.es, as well as their use and storage and/or how you can object to them, can be found at:  
<https://www.lowen-play.es/politica-de-cookies>

## VI. Changes to this Privacy Policy

This privacy policy may be changed due to new legal requirements. Therefore, LP ES PLC recommends that the user regularly check this data protection declaration for possible changes and/or additions.