

# ChatBattlers Privacy Notice

**Revision Date:** February 15, 2024

## 1. INTRODUCTION

Welcome to ChatBattlers, an application (“App”) designed to enhance your streaming experience, integrated with Twitch and available for download through Steam! This App is owned and operated by ShortWolf LLC (referred to as “ShortWolfGames,” “ShortWolf,” “We,” “Us,” and “Our”), a company registered and headquartered in California.

This Privacy Notice (“Notice”) informs you about our practices regarding the collection, use, and disclosure of your personal data within the App. Your use of the App signifies you have read and understood the terms outlined herein, which are tailored to ensure compliance with the California Consumer Privacy Act (“CCPA”), General Data Protection Regulation (“GDPR”), and other applicable privacy laws (collectively, “Data Protection Laws”).

For detailed terms governing your use of the App, please review our End User License Agreement (“Agreement”) available at [chatbattlers.com/eula](https://chatbattlers.com/eula).

## 2. OUR ROLE

We serve as a Data Controller for data collected within the App. We are responsible for managing the collection, use, and protection of your personal data, and determining the processing purposes and means in accordance with Data Protection Laws. It is important to note that for data collected directly by Twitch and Steam, including data obtained through their platforms before interacting with our App, we do not act as the Data Controller. Users should consult Twitch and Steam's respective privacy policies for information on their data handling practices.

## 3. DATA COLLECTION

We do not sell or share your personal data with third parties.

- **User Registration:** We collect your Twitch username, account ID, and email address upon authentication via Twitch for user registration.
- **App Interaction:** Data captured during your interactions with the App is used to enhance your experience and improve our service.

- **Virtual Currency Transactions:** For any in-app purchases, transaction IDs are stored to facilitate these transactions securely. We process virtual currency transactions via a third party, retaining only anonymous IDs that link transactions to accounts, without storing additional payment details.

#### **4. DATA PROCESSING**

We process your data to provide, improve, and personalize the App experience. This includes user registration, facilitating in-app purchases, and enhancing app functionality based on user interactions. Data processing is carried out under the lawful bases of consent, contract performance, and our legitimate interests in offering and improving the App.

#### **5. DATA SHARING**

##### **A. Disclosures**

We may share your personal data under specific circumstances to provide our Services, comply with legal obligations, or protect our legitimate interests. This includes sharing with third parties and international transfers, ensuring protection in line with Data Protection Laws through measures like standard contractual clauses.

##### Disclosure Scenarios:

- **With Consent:** Your data may be shared with your consent, for purposes you agree to.
- **For Legal and Safety Reasons:** We may disclose your data to comply with legal processes or to protect the safety and rights of individuals.
- **During Business Transfers:** In mergers or acquisitions, your data may be transferred, subject to your consent where required.

##### Recipient Categories:

- **Authorized Agents:** Your data may be shared with agents you authorize to act on your behalf.
- **Business Partners:** Shared with partners who co-offer services with us, under strict privacy terms.
- **Service Providers:** Vendors and service providers who assist in our operations are given access to necessary data, under our directives.

- Law Enforcement and Courts: When legally required, your data may be disclosed to law enforcement or in response to legal processes.

## **B. International Transfers**

Your information may be transferred to, stored, and processed in countries outside of your country of residence, including those not deemed to have the same level of data protection laws as your home country. We ensure all data transfers comply with Data Protection Laws.

## **6. DATA RETENTION & SECURITY**

### **A. Storage & Retention:**

We process and store personal data in the United States, using technical, physical, and administrative safeguards to comply with privacy laws. Data is retained according to this Notice, for the duration necessary to provide our services, with extended retention for legal or operational reasons. Efforts to de-identify or anonymize data are made where possible.

### **B. Security Measures:**

We implement security measures including multifactor authentication, encryption, and secure data transmission to protect personal data. Our security practices are regularly reviewed and updated to meet industry standards. However, no system can guarantee complete security. Users are responsible for maintaining the confidentiality of their login information.

### **C. Breach Notification:**

In the event of a data breach, affected users will be notified in accordance with legal requirements, and we will take measures to mitigate and prevent future incidents.

### **D. Third-Party Sites:**

Our service may link to third-party sites, which are not covered by this notice. We advise reviewing their privacy documentation.

## **7. YOUR RIGHTS & CONTROLS**

### **A. Your Rights**

Under certain Data Protection Laws, you have rights concerning your personal data, including access, correction, deletion, and the right to object to or limit processing of your data. Additionally, you have the right to data portability and the right to withdraw consent at any time.

## **B. Your Controls**

You have control over your personal data, including the ability to review, modify, and limit its use. Settings within the App allow you to manage your personal information and preferences, including opting out of certain data uses. For third-party accounts, review and adjust their privacy settings as necessary. To exercise your rights and controls, please contact our team at [contact@chatbattlers.com](mailto:contact@chatbattlers.com).

## **8. GENERAL**

### **A. Updates to This Notice**

We reserve the right to update this Privacy Notice. We will notify you of significant changes and encourage you to review this Notice periodically.

### **B. Contacting a Data Protection Authority (DPA):**

If you have concerns about our data practices, please reach out to us first. California residents, and those in Europe, have the right to contact their local DPA if they believe their data privacy rights have been violated. We encourage resolving issues with us directly, but you can find contact information for your local DPA through the California Attorney General's office for California residents or the DPA Directory for those in Europe. Your DPA may escalate concerns to higher authorities as needed.

### **C. Contact Information**

For any inquiries or to exercise your privacy rights, please contact our team at [contact@chatbattlers.com](mailto:contact@chatbattlers.com).