

LARIAN STUDIOS PUBLIC PRIVACY POLICY

Last update: March 20th, 2018

Larian Studios values your privacy and respects your rights to control your personal data. We aim to be transparent about what data we're collecting and why. We will protect your data like a dragon protects its treasure. We do not sell your data to third parties and we never will.

The overarching purpose of collecting your data is to improve your gaming experience. Whether we are asking you to tell us who you are and what else you like, logging and analyzing gameplay experiences for different gameplay and game experience purposes, or whether we are offering you customer support when something goes wrong, our goal is for you to enjoy our games as much as possible.

This statement explains the personal information we collect from and about you, either directly or indirectly, and how we use it. The statement also covers what choices you can make about the data we collect, and how you can control those choices. It applies to all Larian Studios Products. It additionally applies to any Larian Studios Services, such as Larian Studios owned websites, as well as other offline interactions such as Larian Studios events or Larian Studios booths at conventions.

Please read this statement carefully to understand when you may provide personal information to us and how Larian Studios uses personal information provided. By using Larian Studios Products and Services you agree to the use of your personal information as described in this statement. The terms "we", "us", or "Larian Studios" are each intended to refer to Larian Studios.

To make the information in this statement easy to understand it's structured to highlight different points at which a typical customer would potentially share information with Larian Studios. It is broken down into the following four segments:

- Learning about Larian Studios
- Purchasing Larian Studios Products
- Using Larian Studios Products
- Getting help from Larian Studios

Additional sections give more detail about How We Use Personal Information, Sharing and Disclosure, How to Access and Control Your Personal Information, Other Important Privacy Information, and How to Contact Us regarding your information.

Learning about Larian Studios

As you gather more information about Larian Studios, you may visit a virtual or physical site that we own. Examples include browsing one of our websites, or attending an event Larian Studios is organizing or part of. During these interactions, in order to learn more about our Products, you may voluntarily provide some personal information, such as your name and email address. You might also provide information online via cookies or similar technologies when you visit our websites.

We collect: name, email address, IP address, and information provided by cookies or similar technology.

Why: We use this information to share news about events and products being offered by Larian Studios. Additionally, IP address helps us better understand geographic information about our website visitors so we can improve our website for all visitors.

Purchasing Larian Studios Products

Once you have made the decision to purchase a Larian Studios Product, we sometimes offer ways for customers to purchase directly from us (for instance at larianvault.com or via Kickstarter). When you purchase from us, you may be asked to provide information so that we can complete your purchase. Such information may include things like your name, phone number, email, shipping address, and payment information.

We collect: your name, phone number (optional), email address, shipping address, and payment information.

Why: We use this information to complete your transaction, follow up with you about your purchase, help with the delivery process, handle returns, and other issues related to the purchase of your Larian Studios Products. **Note that we do not store any payment or credit card information. We only use payment information in connection with your purchase of Larian Studios Products.**

Using Larian Studios Products

There are three main reasons we collect information from your Larian Studios Products: (1) to offer you support in case something goes wrong, (2) to offer you improvements and updates based on usage, and (3) to make Larian Studios Products better over time.

Regarding reason number 1: when something goes wrong, you are given the option to send anonymous data to us.

Reasons number 2 and 3: in order to do this, we log and send gameplay decisions but only if you agree to this.

You can opt-out from this data collection, sharing and/or processing.

For support, we may collect:

- **System data.** This data includes things like product version number, driver dates and version numbers, operating system details, computer hardware information (processor name, amount of memory, graphics card installed). It also includes error information provided by our Product (a dump, or the recorded state of the working memory of a computer program at a specific time, generally when the program has crashed or otherwise terminated abnormally).

Why we collect System data: We collect this information to be able to provide you personalized customer support and to guide product improvement and customer support decisions.

For improvements and updates, we may collect:

- **Gameplay logs.** This data includes details about your playing session but is otherwise anonymous. It records things like story decisions, combat decisions, deaths, in-game locations you have visited, in-game shopping decisions, your party and character customization decisions. (It does not include hardware or software information, IP address, email address, usernames, or anything else that does not have anything to do with playing the game.)

Why we collect Gameplay logs: We collect this information so that we can help ensure Larian Studios Products are balanced, fun, clear, working the way we intended and help predict and prevent potential problems with this Larian Studios Product and other (future) Products.

Getting Help from Larian Studios

From time to time, you may decide to contact our Support team for assistance with your Larian Studios Products. In order to offer you the best service possible, we may collect certain data from you or your Products.

We collect: Contact information such as your name, email address, phone number, social media identifiers, and the content of your emails, chats and other communications with Larian Studios Support. In certain situations, it is useful for the Support team to have a "Diagnostic" of your hardware. We collect this information with your permission when helping you troubleshoot your Larian Studios Product.

Why: We collect this information to give you the best and most efficient customer support possible.

Information We Obtain from Third-Party Sources

We protect data obtained from third parties according to the practices described in this statement and we also apply any additional restrictions imposed by the source of data. These third-party sources vary over time, but include partners with which we offer co-branded services or engage in joint marketing activities.

How We Use Personal Information

Larian Studios uses the data we collect to provide you the Products and Services we offer, which includes using data to improve and personalize your experiences. We also use the data to communicate with you, for example, informing you about your account, new Products or Services available, security and other types of updates.

Larian Studios uses the data we collect for the following purposes:

- Providing our Product Experience

- Customer Support
- Product Improvement
- Dispute Resolution
- Business Operations
- Communication, Marketing and Advertising

Providing our Product Experience

We use data to provide and improve the Products we offer and perform essential business operations. This includes maintaining and improving the performance of the Products, including developing new features, research and providing customer support.

Customer Support

We use data to diagnose Product problems, issue software updates and provide other Support and support services.

Product Improvement

We use data to continually improve our Products and Services, including adding new features, and fixing issues.

Dispute Resolution

We use data to resolve disputes, protect our interests and enforce our agreements.

Business Operations

We use data to develop aggregate analysis and business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business.

Communication, Marketing and Advertising

We use data we collect to deliver and personalize our communications with you. For example, we may contact you by email or other means of electronic

communication to inform you about new Larian Studios Products or Services, software updates, update you on a support issue, or invite you to participate in a survey. Additionally, we use cookies and similar technologies to provide the most relevant Larian Studios advertising to you.

For information about managing email subscriptions and promotional communications, please visit the 'How to Access and Control Your Personal Information' section of this statement.

Sharing and Disclosure

Larian Studios does not and will not sell personal information about our customers. We only disclose your data as authorized in this statement. We may share information with the following types of third parties described below and always ensure, when sharing information, such third parties adhere to the same principles.

To Whom We Disclose your Personal Information and Why

- **Third Party Vendors.** Larian Studios uses a variety of third party vendors to perform services such as website management and hosting, online Product purchases and shipping, credit card processing and email communications. We share your personal data as necessary to complete any transaction or provide any Product or Service you have requested or authorized; with vendors or agents working on our behalf for the purposes described in this statement. In such instances, your personal information will be shared with these agents or contractors but only for the purpose of performing services on behalf of Larian Studios and in accordance with this statement. The updated list of these parties may be requested from Larian Studios at any time.

- Parties with whom it might be necessary when we reasonably believe it is required by law or in connection with legal proceedings; to prevent harm to Larian Studios or its customers; for the prevention and detection of crime or the apprehension or prosecution of offenders; to protect the rights or property of Larian Studios.
- Parties with whom it might be necessary to complete a financial or corporate transaction such as a merger or sale of assets.
- We also share data with Larian Studios-controlled affiliates and subsidiaries.

We may also share non-personal information such as aggregated data with our partners or publicly. For example, we may inform a games service about how their users have utilized Larian Studios Products on their platform, or we may share the total sales of a Larian Studios Product, or share overall game statistics with our audience.

Please note that our Products sometimes run in applications of third parties whose privacy practices differ from Larian Studios. If you provide personal data to any of those third parties or their Products, your data is governed by their privacy statements.

How to Access and Control Your Personal Information

You can view, edit or delete your personal data in either your Larian Studios account (for instance the data on the Larian forums or the Larian Vault websites), or by reaching out to us directly to privacy@larian.com. When you receive emails from us, you can always choose to stop receiving promotional emails and other types of marketing communication from us.

Advertising

You can adjust the amount of "interest based advertising" (as described below) you may receive by changing your cookie settings, changing your device settings, and/or opting out of certain advertising networks. Additionally, if you have opted out of receiving emails from us, we will not use your email for interest based advertising activities.

Please note that regardless of your communication settings, we may continue to communicate with you for Product software updates, policy updates, or significant information about a Product you own such as discontinuance of support or safety issues.

Cookies and Similar Technologies

We use cookies and similar technologies like pixels, tags, web beacons, and other identifiers to help us personalize our website for you, remember your preferences, understand how users are using our website, and help customize our marketing offerings. By visiting our website, you agree to the use of cookies and similar technologies for the purposes we describe in this statement.

Cookies

A "cookie" is a small data file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. The length of time a cookie will stay on your computer or mobile device depends on whether it is a "persistent" or "session" cookie. Larian Studios uses both types of cookies. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted. We use the following types of cookies on our website.

- Strictly necessary cookies. These cookies are essential to enable you to browse around our website and use its features. Without these cookies, services like shopping baskets cannot be provided.
- Performance cookies. These cookies collect information about how you use our websites. This data may be used to help optimize our website and make it easier for you to navigate.
- Functional cookies. These cookies allow our website to remember your settings and help personalize your experience. For instance, we may store your geographic location in a cookie to ensure that we show you the Larian Studios website localized for your area.
- Third Party cookies. Third party cookies are those placed by websites and/or parties other than Larian Studios. These cookies may be used on our website for improvement of our products or services or to help us provide more relevant advertising. These cookies are subject to the respective privacy policies for these external services, for example, the Facebook Data Use Policy.
- Analytics cookies. We use analytics cookies, such as those offered by Google Analytics, to help us understand things like how long a visitor stays on our website, what pages they find most useful, and how they arrived at larian.com.

How to control cookie settings

Most web browsers allow you to control cookies through their settings preferences, however, if you limit the ability of websites to set cookies, you may worsen your overall user experience.

Pixels

In addition to cookies, we sometimes utilize small graphic images known as "pixels" (also known as web beacons, clear GIFs, or pixel tags). We may use pixels in our email communications sent to you (if you have selected to receive

such communications) to help us to understand whether our email communication was viewed. Additionally, we may use third-party pixels (such as those from Google, Facebook, and other advertising networks) to help us provide advertising of Larian Studios Products or Services that is relevant to your interests.

Advertising and Modern Marketing Tools

To help more people play Larian Studios games, we utilize several modern marketing tools for our advertising efforts.

Larian Studios may work with third party advertisers that utilize cookies and similar technologies to provide more relevant advertising about Larian Studios Products on our website and across the internet. To provide this "interest-based advertising", these parties combine non-personal data learned about your online activities over time which helps ensure that your advertisement is customized to you. Examples of this may include a display of a Larian Studios advertisement on a Facebook page, on a Google-owned page such as a search results page or YouTube, or on a site within Google's advertising network. We do not share your personal information as part of this process. You can opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the [Network Advertising Initiative \(NAI\)](#) or who follow the [Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising](#) by visiting the [opt-out pages on the NAI website](#) and [DAA website](#). Electing to opt out may make the ads you see on the internet less relevant to you.

If you have [opted out](#) of receiving communications from us, we will not use your email address in this for interest-based advertising, although you may still be subject to certain interest-based advertising depending upon your browser and device settings.

Security

Larian Studios is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure.

While no Service is completely secure, Larian Studios takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration, and destruction.

The servers on which your personal information is stored are kept in a controlled environment with limited access. While we take reasonable efforts to guard personal information we knowingly collect directly from you, no security system is impenetrable.

You may access your Larian Studios account information and our service only through the use of an individual user login and password. To protect the confidentiality of personal information, you must keep your password confidential and not disclose it to any other person. Please advise us immediately if you believe your password has been misused. In addition, always log out and close your browser when you finish your session. **Please note that we will never ask you to disclose your password in an unsolicited phone call or email.**

If you have any questions about the security of your personal information, you can contact us at privacy@larian.com.

Other Important Privacy Information

Our Policy Towards Children

Larian Studios does not knowingly solicit personal information from children or send them requests for personal information.

Although visitors of all ages may navigate through our website, we do not intentionally collect personal information from persons under the age of sixteen. If following a notification by a parent or guardian, or discovery by other means, that a child under sixteen has improperly registered on this site by using false information, we will cancel the child's account and delete the child's personal information from our records.

Where We Store and Process Personal Data

Personal data collected by Larian Studios may be stored and processed in your region, in the United States or in any other country where Larian Studios or its affiliates, subsidiaries or service providers maintain facilities.

All information you provide may be transferred or accessed by entities around the world as described in this statement. Larian Studios uses approved Standard Contractual Clauses for the international transfers of personal information collected in the European Economic Area and Switzerland.

Our Retention of Personal Data

Larian Studios retains personal data for as long as necessary to provide the Services, support your Product and fulfill the transactions you have requested, or for other essential purposes such as complying with our legal obligations, and resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the context of different Products or Services, actual retention periods can vary significantly.

Changes to Our Privacy statement

Larian Studios may modify or update this statement when necessary to reflect customer feedback and changes in our Products and Service; so, please review it periodically. When we update this statement, we will revise the "Last

Updated" date at the top of the statement. If there are material changes to the statement or in how Larian Studios uses your personal data, we will notify you either by posting a notice of such changes before they take effect or by sending you a notification. We encourage you to periodically review this statement to learn more about how Larian Studios is using and protecting your information. Your continued use of the Service or Products after any modification to this statement will constitute your acceptance of such modification and updates.

How to Contact Us

If you have any questions about the use of your personal information, please send us an email to privacy@larian.com.

Unless otherwise stated, Larian Studios is a data controller for personal data we collect through the Products and Services subject to this statement. Our address is:

Larian Studios Games Ltd.

7-12a Fumbally Mews

Fumbally Lane

Dublin 8, Ireland

FAQ

The following are basic questions you may have about our privacy statement. We encourage you to read the detailed statement above for additional details.

What information does Larian Studios collect about me?

Larian Studios may collect some or all of the following, depending on the service agreement we have with you: your name, phone number, email address, shipping address, payment information, location data, IP address, social identifiers, data provided by cookies and similar technologies, functional data

such as registration and system data, as well as additional usage data; for instance, performance and activity information.

Why does Larian Studios need my information?

Larian Studios uses the data we collect to provide you the best experience within products and services we offer, which includes using data to improve your experiences. We also use the data to communicate with you, for example, for support purposes, informing you about your account, new products or services available, security and other types of updates.

How is my information used?

Larian Studios uses the data we collect for the following purposes:

- Providing our Product Experience
- Customer Support
- Product Improvement
- Dispute Resolution
- Business Operations
- Communication, Marketing, and Advertising

How does collecting my information help Larian Studios improve its products?

We collect error reports, so we can make improvements (e.g. balancing, fun factor) and eliminate potential bugs and problems. Understanding how our players collectively play our Products, helps us design new ways to create Products you love.

Can I opt out of sharing my information with Larian Studios?

Yes, you can opt out of submitting certain types of personal information to Larian Studios; for instance, additional usage data such as performance and activity information.

How do I delete my personal data from Larian Studios and what are the consequences?

You can always send us an email to privacy@larian.com or contact our Support team and request that your data be deleted. Please note, however, that by deleting your personal data Larian Studios can no longer answer support questions or follow up on orders or provide other services.

How long does Larian Studios keep my information?

Larian Studios retains personal data for as long as necessary to provide the services, support your product and fulfill the transactions you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the context of different products or services, actual retention periods can vary significantly.

How is information stored and secured on Larian Studios' servers?

Larian Studios is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorized access, use or disclosure. For example, we store the personal data you provide on computer systems that have limited access and are in controlled facilities. Any data we transmit over the internet is protected using encryption.

Is Larian Studios using cookies or pixels to gather information?

Yes, we use cookies and similar technologies like pixels, tags and web beacons when you visit our website. By visiting our website, you agree to the use of cookies and similar technologies for the purposes we describe in our privacy statement. This helps us provide you with the best experience and allows certain parts of our website to function properly. You always can adjust your browser or device settings to not accept cookies and similar technologies if this concerns you.

Does Larian Studios use interest-based advertising?

Yes. We work with third-party advertisers that utilize cookies and similar technologies to provide more relevant advertising about Larian Studios on our website and across the internet. To provide interest-based advertising, the advertisers combine non-personal data learned about your online activities over time to customize the advertising delivered to you. We do not share your personal information to do this.

What safeguards are in place for children who have access to Larian Studios products?

Larian Studios does not knowingly solicit personal information from children or send them requests for personal information. Although visitors of all ages may navigate through our website, we do not intentionally collect personal information from persons under the age of sixteen. If following a notification by a parent or guardian, or discovery by other means, that a child under sixteen has improperly registered on this site by using false information, we will cancel the child's account and delete the child's personal information from our records.

How can I contact Larian Studios if I have questions regarding Larian Studios privacy statement?

If you have any questions about the use of your personal information, please send us an email to privacy@larian.com.