

## **PRIVACY POLICY**

### **MIDNIGHT FORGE OY (VIRTUAL DAWN)**

Revised: 11/07, 2022

Midnight Forge Oy (Virtual Dawn) VAT number 2504471-2

contact@virtual-dawn.com, Näsilinnankatu 16 C 7, 33210 Tampere FINLAND

This Privacy Policy explains Midnight Forge Oy's (Virtual Dawn, hereinafter referred to as Virtual Dawn) data practices for the products, services, and websites (collectively the "Services") that Virtual Dawn offers to consumers and businesses.

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## **SCOPE OF THIS POLICY AND WHO VIRTUAL DAWN IS**

This Privacy Policy applies to Virtual Dawn. Please read this Privacy Policy carefully. The Services also are subject to Virtual Dawn's Limited Software Warranty and License Agreement ("EULA"), Terms of Service, and any other policies included in Virtual Dawn's Services. This Privacy Policy supplements privacy disclosures provided with your software product and from your software manufacturer.

- Virtual Dawn is the data controller responsible for information.

## **INFORMATION VIRTUAL DAWN COLLECTS AND VIRTUAL DAWN'S LAWFUL BASES FOR PROCESSING**

You provide Virtual Dawn with information directly, such as when you set up an account with Virtual Dawn. Virtual Dawn also collects information about you and your activity when you use Virtual Dawn's Services - Via Head Set and installed Virtual Dawn software like Virtual Reality Education World. Virtual Dawn may use online tracking, such as cookies and similar technology, to collect information when you connect to Virtual Dawn's Services, and Virtual Dawn collects information from third parties (such as advertising networks and external business partners). Virtual Dawn also installs administration tools for the headsets that they rent to the client. This is the way to get newest updates and content expansions to clients with minimal work for the client and with efficiency. This gives Virtual Dawn ability to control the device from distance for problem solving. This can be done also to clients own headsets but the client must be aware that Virtual Dawn can control the headset if this is in place. Clients can also become the admin of their own headsets and mass update the simulations independently. The administration tools are not needed for Virtual Dawn software to work, but are given as an option to maximize the ease of use.

The types of information that Virtual Dawn collects depend on how you use the Services and interact with Virtual Dawn. You can control the personal information Virtual Dawn collects from you unless Virtual Dawn needs it for the requested activity (e.g., to provide the Services you've requested or purchased, to confirm who you are, or to participate in an event). Virtual Dawn will let you know when information is necessary.



- Information You Provide

You provide Virtual Dawn with information when you use the Services, such as when you:

- create an account, or register for or use the Services;
- subscribe to newsletters and communications;
- comment on Virtual Dawn's message boards, forums, chat rooms, feeds, sites, or other Services;
- purchase or redeem one of Virtual Dawn's products or services, including physical items, virtual items, or add-ons;
- download, install, or access demos, programs, or other software;
- contact Virtual Dawn for support or other purposes;
- use Virtual Dawn's email / share features;
- participate in events, contests, promotions, or surveys; or
- participate in an activity where you can provide, or need to provide, your information.

Depending on the Service or your activity, Virtual Dawn collects information such as your name, email address, phone number, photo, mailing address / zip code, payment or purchase information, age, gender, hardware configuration, hardware ID, software products played, survey data, IP address, geolocation, and the systems you play on. Virtual Dawn combines this information across computers or other devices that you use.

- Using the simulations Virtual Dawn has created/ or any other software provided by Virtual Dawn.

When you use the Services on hardware connected to the Internet, Virtual Dawn receives information about your session with the simulations even if you are not specifically notified at the time or do not take any actions to actively give Virtual Dawn this information. Your session with the simulation's information includes achievements, scores and performance, IP address, MAC address or other device ID, device information, and other information and statistics regarding your Service use. Virtual Dawn collects information even if you do not register for the Services and Virtual Dawn may collect VR Session / Desktop version session use information while you are offline. Offline information is transmitted to Virtual Dawn when you next connect to the Internet. Virtual Dawn may combine use of Virtual Dawn's software information with other information Virtual Dawn has about you.



#### - Social Networking Information

Virtual Dawn collects information when you use third-party platforms like a APP platform account, app purchase network service account, or social networking service account to connect to or engage with Virtual Dawn's Services. When you use these third-party platforms or link your Virtual Dawn account, the third-party platforms provide Virtual Dawn with information about you. For example, depending on your use of, or activity on the third-party platform, Virtual Dawn receives your username, your friends list, or account information necessary to provide a purchased item. The third-party platform may allow you to control what information is provided to Virtual Dawn. Virtual Dawn is not responsible for the terms, policies, disclosures, or actions of any third-party platforms.

#### - Information from Third Parties

Virtual Dawn receives information from third parties to update the information that Virtual Dawn collects about you. For example, Virtual Dawn receives information from public databases, hardware manufacturers, analytics providers, game developers, and other business partners that include demographic information and information about your interests. Virtual Dawn obtains information from social media and other publicly available sources, which Virtual Dawn may use to better understand its users or to seek intelligence about breaches of Virtual Dawn's Terms of Service. Virtual Dawn also receives information from other individuals who use its Services. This may include information about you if you are mentioned in comments on Virtual Dawn's message boards, forums, chat rooms, or other Services, or an individual sends Virtual Dawn a direct message, for example, about an alleged breach of our Terms of Service.

#### - Lawful Basis to Process in Certain Locations

Virtual Dawn collects, uses, and otherwise processes your information when Virtual Dawn has a lawful basis, as follows:

- Consent: Virtual Dawn asks you for consent to collect or use your personal information for specific purposes, such as when Virtual Dawn wants to send you emails about special offers or competitions, or if you decide to link your Virtual Dawn account with a third-party service.



- Contract Performance: Virtual Dawn processes your personal information when Virtual Dawn needs to perform and manage a contract with you, such as Virtual Dawn's Terms of Service, or to take steps at your request before Virtual Dawn enters into a contract with you, such as to complete transactions with you and to allow you to use our software online.
- Legal Requirement: Virtual Dawn processes your personal information when required by law.
- Legitimate Interest: Virtual Dawn processes your personal information when necessary for Virtual Dawn's, or others', legitimate interests and when these interests do not outweigh your own rights and interests. This covers processing for purposes such as improving Virtual Dawn's products and services; performing analytics and using surveys to better understand Virtual Dawn's users; conducting direct marketing (when Virtual Dawn does not need your consent); otherwise supporting Virtual Dawn's business, operations, and services; ensuring the proper function, security, and integrity of Virtual Dawn's services; dealing with user questions; enforcing Virtual Dawn's Terms of Service and EULA; preventing fraud; preventing illegal activity; preventing violations of Virtual Dawn's EULA, Terms of Service, Code of Conduct, or other policies; and preventing intellectual property right infringement.

## COOKIES AND SIMILAR TECHNOLOGY

Cookies are very small text files that companies place on your device when you visit or use some sites, applications, or other web-based services to help identify a computer, browser, or device. Virtual Dawn uses cookies, web beacons, Internet log files, and similar tracking technologies (Virtual Dawn's and from third-party providers) to allow Virtual Dawn's Services to function; maintain your preferences and settings; provide enhanced features; analyze how users use Virtual Dawn's Services; combat fraud; prevent violations of Virtual Dawn's EULA and policies; and to provide you with targeted advertising based on your interests. If you choose to provide Virtual Dawn with information, it may be linked to the information collected by cookies and similar technologies including advertising cookies. Virtual Dawn's system may not respond to Do Not Track requests or headers from some or all browsers. The Manage Your Account, Communications, and Data section below provides additional information about Virtual Dawn's use of cookies and similar technologies and your ability to manage cookies. You may also use the cookie preference tool, where available, or visit the cookie policy posted on the Service for more information.



- Cookies

Cookies are used to identify a computer, browser, or device. Certain cookies are necessary for the Services to function and others let Virtual Dawn to provide you with an enhanced experience. You can disable cookies on your device or set your browser to alert you when Virtual Dawn or others send cookies to your device but disabling cookies may affect your ability to use certain Services. For more information, including details of specific cookies Virtual Dawn uses, applicable for the Service, see the cookie preference tool or visit the cookie policy posted on the Service you are visiting. You can find more information and make choices about third-party cookie providers in the following sections of this Privacy Policy: When Virtual Dawn Shares Information, Advertising and Manage Your Account, Communications, and Data.

- Flash Cookies

Virtual Dawn may use flash cookies, also known as "local shared objects." You can clear flash cookies already on your device by adjusting the flash local storage setting on your device to zero. You may also prevent entities from placing flash cookies on your device by adjusting your preferences in the Macromedia Website Privacy Settings Panel at [www.macromedia.com](http://www.macromedia.com).

- Web Beacons

A web beacon is an electronic image or tag that helps Virtual Dawn deliver cookies, count users who have visited certain pages or viewed certain advertisements or mailings, and conduct analytics for Virtual Dawn's Services and communications.

- Internet Log Files

Virtual Dawn may collect Internet log files when you use the Services. These log files can include IP addresses, MAC addresses or other device IDs, depending on your network configuration. Depending on the Service you use or the activity you engage in, Virtual Dawn associates these log files with your information.



## HOW VIRTUAL DAWN USES INFORMATION

Virtual Dawn uses the information it collects from and about you within Virtual Dawn for a variety of business purposes including to: provide the Services; fulfill orders and requests; analyze and improve Virtual Dawn's Services and business; communicate with you; respond to questions or technical problems; develop internal marketing and demographic studies; provide support and security for Virtual Dawn's products; and as more fully described in this Privacy Policy.

Virtual Dawn also uses your information within Virtual Dawn for commercial purposes, including: send you and similar consumers direct marketing and online / social media advertising from Virtual Dawn and Virtual Dawn's business partners, including use of demographic information; for other purposes identified when you provide your information; or otherwise with your permission. Virtual Dawn may further use your information as permitted by law.

If Virtual Dawn finds that you have breached its Terms of Service or other applicable policies, this could lead to your temporary or permanent exclusion from the Services.

Virtual Dawn uses information collected from and about you for business purposes including to:

- Provide the Services;
- Fulfill product orders and other requests, respond to your questions, and communicate with you;
- Enhance your experience on the Services, including to recognize you, maintain your preferences and settings, and link to your third-party hardware, gaming, and social networking platforms;
- Provide technical and other support;
- Review the use and operations of the Services, develop new products or services, and conduct analyses to enhance or improve Virtual Dawn's software, content, internal marketing, support, and Services;
- Conduct internal marketing and demographic studies;
- Analyze Virtual Dawn's users, in combination with other data, to assess Virtual Dawn's user base and target marketing at other similar groups;



- Address issues with the Services or other business needs;
- To protect the security or integrity of the Services and Virtual Dawn's business such as by protecting against and preventing violation of Virtual Dawn's EULA and policies, including combating fraud, piracy, cheating, tampering, unauthorized transactions, claims, and other liabilities, and managing risk exposure; and
- Interact on your behalf with the third-party social networking platforms you connect with Virtual Dawn's Services.

Virtual Dawn uses information collected from and about you for commercial purposes, including to:

- Provide you and other users like you with customized content on the Services, targeted offers and advertising on the Services, via email Virtual Dawn or its business partners; and
- Contact you with information, newsletters, and promotional material.

Virtual Dawn also uses information collected from and about you to:

- Participate in other processing that Virtual Dawn informs you about when you provide your information or when you consent to such processing; and
- As permitted by law.

Virtual Dawn uses the information we collect within the Midnight Forge Oy.

If you breach Virtual Dawn's Terms of Service or other applicable policies, Virtual Dawn may temporarily or permanently exclude you from the Services. If you have violated Virtual Dawn's policies by creating certain user generated content, Virtual Dawn may also temporarily or permanently limit your ability to make new user generated content.

## **WHEN VIRTUAL DAWN SHARES INFORMATION**

As detailed in this Privacy Policy, Virtual Dawn shares your information with its vendors that perform support and other services in connection with the Services; advertising service providers and advertising partners that enable Virtual Dawn to conduct and display advertising on the Services and third-party sites, mobile applications, or social media services; and with third parties for collaborative offerings, legal and safety purposes, in connection with the sale or transfer of a business or asset, for use in aggregate or anonymous form, and for other purposes with your permission.





- Vendors

Virtual Dawn uses vendors to perform services on its behalf. These vendors provide business, professional or technical support to Virtual Dawn, help Virtual Dawn operate its business and Services, or administer activities in connection with Virtual Dawn's business and the Services on its behalf. These vendors are not permitted to use or share your personal information for their own or a third party's commercial purposes.

- Advertising

Virtual Dawn uses Midnight Forge Oy and third-party advertising to support our Services, such as ad networks, data exchanges, traffic management service providers, social networks and marketing analytics service providers. These providers use cookies and similar tracking technology (see Cookies and Similar Technology above) to collect information about your device and your Service use. This information, along with information that Virtual Dawn shares with them, enables Virtual Dawn or its providers to recognize you or your device and to serve ads to you or your device. This includes, as relevant, your device type; IP address; MAC address or other device ID; a secured (hashed) version of an email address you have provided to us; HMD ID; IDFA, Android ID, or other advertising ID; browser type and version, character set, screen size and color; language; operating system and version; font packages installed; geographic location; types of pages, content and ads viewed on the device; frequency of and time spent during your visit; and information about your use of a site or Service (e.g., whether you make a purchase).

Virtual Dawn (and sometimes its providers) collect or share this information when you use Virtual Dawn's Services, click on a site or an ad, or launch one of Virtual Dawn's software or other mobile applications. This information: (1) allows Virtual Dawn to accurately and properly pay for ads placed on its behalf (e.g., an ad that led you to purchase or download one of Virtual Dawn's software) and get paid when you see an ad on Virtual Dawn's Services; (2) helps prevent you from repeatedly seeing the same ads; (3) helps select and display targeted ads or other content on your computer or device (such as on a site or social networking service you are visiting or a mobile application you are using) that may be of particular interest to you; (4) helps with measuring and analyzing the effectiveness of



Virtual Dawn's ads, popularity of content, and traffic in its Services; and (5) helps Virtual Dawn improve its Services.

You can learn more about managing how Virtual Dawn and its providers use your information in the Manage Your Account, Communications, and Data section below; and, as applicable for the Service, by using Virtual Dawn's cookie preference tool, where available, or visiting the cookie policy posted on the Service.

- Third Parties

Virtual Dawn shares your information with third parties as described in this Privacy Policy, including as follows:

- Collaborative Relationships: When Virtual Dawn offers services or promotions in collaboration with a third party who will receive your information for its own use, Virtual Dawn will inform you of that at the time of collection and you may choose whether to participate in the offering.
- Legal & Safety: Virtual Dawn may share your information to protect the security of its Services, servers, network systems, databases, and business and in connection with an investigation of fraud, intellectual property infringements, interference with Virtual Dawn's rights, property or users, or other activity that is illegal or may expose you or Virtual Dawn to legal liability, including as required or requested by law enforcement or other government officials. Virtual Dawn also may share your information with third parties when Virtual Dawn has reason to believe that a disclosure is necessary to address potential or actual injury or interference with Virtual Dawn's rights, property, operations, users, or others who may be harmed or may suffer loss or damage, or when Virtual Dawn believes that it is necessary to protect its rights, investigate, or enforce its policies, terms, combat fraud, or comply with a judicial proceeding, court order, or legal process served on Virtual Dawn. Virtual Dawn also may share your information when Virtual Dawn has reason to believe it is necessary to investigate or enforce its policies, terms, or other legal document or contract related to the Services or rights of a third-party.
- Sale or Transfer of Business or Assets: Virtual Dawn may sell or purchase assets during the normal course of its business. Virtual Dawn may disclose information about you and transfer that information to another entity as part of a potential or actual acquisition or merger of Take-Two or any of Virtual Dawn's assets. If Virtual Dawn brings or is defending a reorganization, bankruptcy, or similar event, such information may be considered Virtual Dawn's asset and sold or transferred to third parties.



- Aggregate or Anonymous Information: Virtual Dawn may share aggregate or anonymous information with third parties for their marketing or analytics uses. This information cannot be used to identify you.
- As Disclosed to You: Virtual Dawn may share your information as disclosed to you at the time of collection.

## MANAGE YOUR ACCOUNT, COMMUNICATIONS, AND DATA

Virtual Dawn provides several options for you to manage your Service account, communications you receive from Virtual Dawn, and how Virtual Dawn uses your information. These include through the settings in your Service account; utilizing email unsubscribe and deletion tools; opting out of interest-based ads; making a data request or exercising your right to object to Virtual Dawn's use of your personal information. This can include, in some countries, a right to object to Virtual Dawn's use of your data.

### - Service Accounts

You can manage how Virtual Dawn uses your personal information and the communications that you receive from Virtual Dawn by logging in to your Service account and using its account and privacy settings.

### - Email Unsubscribe

If you have subscribed to a marketing or newsletter list from Virtual Dawn, you can unsubscribe from that list when you receive a marketing or newsletter email from a specific label or division by using the unsubscribe link that is provided in the email.

### - Interest-Based Ads

On your mobile device, you may adjust your privacy and advertising settings to control whether you want to receive advertising based on your interests. To opt out from the use of your online activities for interest-based activities by participating providers, please visit the Network Advertising Initiative at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) or the Digital Advertising Alliance at <http://www.aboutads.info/> to select the applicable



networks. For visitors from the UK, EU, EEA or Switzerland, visit Your Online Choices at <http://www.youronlinechoices.eu/>.

#### - Virtual Dawn

To delete your Virtual Dawn account or, depending on your location, submit a request to object, delete, restrict, correct, or receive a copy of the personal information collected about you by Virtual Dawn send email at [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com) and request. Virtual Dawn will respond to data requests within 30 days. To the extent these rights apply to you, they may be limited in some situations – for example when Virtual Dawn is under a legal requirement or have a compelling interest for processing your personal information, or when the information is protected by trade secret. If you have unresolved concerns, where applicable, you may also have the right to complain to a data protection authority. Alternatively, if you do not have access to your Social Club account and wish to make a request, please contact Virtual Dawn using the details provided in the Contact Us section below.

As described in the How Virtual Dawn Uses Information section above, when you use certain features, your activity is public. Even if you delete your account or data, some activity information may still appear.

#### Virtual Dawn

To make a data request and depending on your location, submit a request to object, delete, restrict, correct, or receive a copy of the personal information collected about you by us, send an e-mail to [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com). Please identify your country of residence and the specific account you have. Virtual Dawn will respond to data requests within 30 days. To the extent these rights apply to you, they may be limited in some situations – for example when Virtual Dawn is under a legal requirement or have a compelling interest for processing your personal information, or when the personal information is protected by trade secret. If you have unresolved concerns, where applicable, you may also have the right to complain to a data protection authority.

#### - Virtual Dawn Labels and Divisions



To make a data request and depending on your location, submit a request to object, delete, restrict, correct, or receive a copy of the personal information collected about you send email at [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com).

## DATA RETENTION

Virtual Dawn retains your information while your account is active, as needed to provide you Services, or to administer Virtual Dawn's Services. If you wish to cancel your account or request that Virtual Dawn no longer use your personal information to provide Services to you, contact Virtual Dawn as identified in the Manage Your Account, Communications, and Data section above. If your account is inactive, Virtual Dawn will maintain your account for the length of time for which Virtual Dawn reasonably expects you to re-engage with Virtual Dawn's Services. After such a period, Virtual Dawn will delete personal information, including your email address and log-in credentials, and you may no longer be able to access your account. Virtual Dawn will notify you before Virtual Dawn deletes your account information so that you have the opportunity to keep your account active. Virtual Dawn may still retain some of your personal information in Virtual Dawn's files for a reasonable period of time to resolve disputes, enforce Virtual Dawn's EULA or Terms of Service, administer Virtual Dawn's services, comply with technical and legal requirements, and/or other constraints related to the security, integrity, and operation of Virtual Dawn's Services, after which Virtual Dawn will take steps to delete or archive your personal information.

## CHILDREN'S PRIVACY

Generally, Virtual Dawn directs its Services to a general audience and Virtual Dawn does not knowingly collect personal information from children under 13 years old (or older, if applicable law provides for different protections). Virtual Dawn may direct certain Services to an audience of all ages—including children. For these Services, Virtual Dawn may restrict the collection of personal information on the Services from anyone, apply an age gate allowing children to use the Services while restricting the collection of personal



information on the Services from children, or get a parent's permission to collect personal information from children. If Virtual Dawn becomes aware that a child has provided personal information without a parent's permission, Virtual Dawn will promptly delete this information. Virtual Dawn encourages parents to instruct their children to never give out their real names, addresses, or phone numbers, without permission, when using the Internet.

## DATA SECURITY

Virtual Dawn follows generally accepted industry standards and maintains appropriate safeguards to help protect the security, integrity, and privacy of the information collected about you. These security measures are designed to protect against the accidental or unlawful destruction, loss, misuse, alteration, and unauthorized disclosure of, or access to, the information under Virtual Dawn's control. However, no system can be 100% secure and Virtual Dawn cannot guarantee its security measures.

## INTERNATIONAL TRANSFERS

Virtual Dawn and its vendors may process, transfer, and store information about you in connection with the Services in the United States and other countries that may not have data protection laws equivalent to the country where you reside. Virtual Dawn takes steps to apply appropriate safeguards when transferring that information.

When your information is in another country, it may be accessed by the courts, law enforcement, and national security authorities pursuant to the laws of that country. If you reside in the UK, EU, EEA or Switzerland, Virtual Dawn relies on Standard Contractual Clauses and/or other approved legal mechanisms to transfer personal information from the UK, EU, EEA or Switzerland to countries located outside of these locations (as applicable). To request a copy of such Standard Contractual Clauses, if applicable, please make a data request as provided under the Manage Your Account, Communications, and Data section above.



## **OTHER VIRTUAL DAWN TERMS, THIRD-PARTY TERMS, AND LINKS TO OTHER SITES**

Use of Virtual Dawn's services and products may be subject to other terms and disclosures provided by Virtual Dawn, hardware manufacturers, and other partners, including: (i) the EULA that accompanied your purchase; (ii) Virtual Dawn's Terms of Service; (iii) other terms and disclosures made available to you by Virtual Dawn or third parties.

Virtual Dawn is not responsible for practices on third-party sites that may be linked to the Services.

### **- Third-Party Services**

If you connect to Virtual Dawn through third-party services such as HMD, mobile device, gaming, and social networking platforms, that third-party's terms of service and privacy policy govern your use of that service. Virtual Dawn is not responsible for third-party services.

### **- Third-Party Sites**

Virtual Dawn's Services may direct you to third-party sites. If Virtual Dawn links to another site, it is not an endorsement, authorization, or representation of Virtual Dawn's affiliation with that third party. Virtual Dawn recommends that you read the privacy policy of the other site before you submit any of your personal information to that site.

## **PUBLIC POSTINGS**

If you share personal information, post an image or video, or provide other content in public forums such as on a message board, chat room, comment field, or profile page, other people can view, collect, and use that information. If your username or ID contains your real name, then you acknowledge that your name will be made publicly available on leaderboards and elsewhere as described in this Privacy Policy. Users of such public forums may be able to identify you, use the information to send you messages, or copy any of the images, video, or content you have shared. There is no expectation of privacy



or confidentiality on any of these public forums. You are strongly encouraged not to share your personal information in public forums or in your username or ID. You are responsible for any information or content you publicly post using Virtual Dawn's Services.

## CONTACT VIRTUAL DAWN

If you have questions or concerns about this Privacy Policy or Virtual Dawn practices, contact our Privacy Policy Administrator [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com). Please indicate that in your email, letter, or phone call; you may also have the right to complain to a data protection authority. Virtual Dawn does not respond to support requests or other non-privacy related correspondence at this point of contact.

## CHANGES TO PRIVACY POLICY

Virtual Dawn reserves the right to make changes to this Privacy Policy. Please check back from time to time to ensure that you are aware of these changes. If Virtual Dawn changes this Privacy Policy in a material way, Virtual Dawn will provide appropriate notice to you and, as appropriate, provide additional choices regarding such change. As permitted by applicable law, your continued use of the Services means that you accept these changes.





## GDPR PRIVACY NOTICE

Midnight Forge Oy (Virtual Dawn) VAT number 2504471-2

[contact@virtual-dawn.com](mailto:contact@virtual-dawn.com), Näsilinnankatu 16 C 7, 33210 Tampere FINLAND

GDPR Privacy notice.

Virtual Dawn's representative is the CEO Antti Martikainen who is also the Data Protection Officer. Reached via email: [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com)

Virtual Dawn collects the following data:

- Personal identification information (Name, email address, phone number, and other data that are asked and given during the purchase process).
- The Virtual Reality simulations Virtual Dawn offers are used with hardware that has Virtual Dawn's administration software installed into it. Virtual Dawn does not gather data about what other use the hardware has, besides usage of Virtual Dawn's simulations.
- Virtual Dawn gathers information about when the simulations are used, how long they are used. Virtual Dawn gathers information about user performance during the simulation run, for example, if Virtual Dawn notices that users have been having issues with a certain task or certain spot in simulation Virtual Dawn considers this as a possible bug and try to fix it.
- Virtual Dawn cannot identify who exactly is using the simulation or what purpose, Virtual Dawn only want to know information that helps Virtual Dawn to learn more about its simulation performance and what might improve its product.
- Virtual Dawn creates statistics about the performance of the users in simulations, for example how long does it take to perform tasks and such.

**How does Virtual Dawn collect your data?**



You directly provide Virtual Dawn with most of the data collected. Virtual Dawn collects data and process data when you:

- Register online or place an order for any of Virtual Dawn's products or services.
- Voluntarily complete a customer survey or provide feedback on any of Virtual Dawn's message boards or via email.
- Use or view Virtual Dawn's website via your browser's cookies.
- When Virtual Dawn's products are being used, they deliver Virtual Dawn information about the performance and actions of the user, Virtual Dawn does not have any means to figure out who exactly has been using the simulation. UNLESS the institution that is using Virtual Dawn's simulations especially has requested a method to identify a student who is using the simulation and this is part of the institutions needs and actions, in this case the institution/entity who is using Virtual Dawn's simulations should inform the students/users that their performance is monitored individually and certain teacher/entity receive information of their performance.

Virtual Dawn collects your data to be able to:

- Process your order and manage your account.
- Email you with special offers on other products and services Virtual Dawn thinks you might like.
- Improve the performance of Virtual Dawn's products
- Offer ongoing support in form of updating Virtual Dawn's products
- Understand how to create more user friendly simulations
- Find and fix possible bugs and crashes in software
- Improve Virtual Dawn's knowledge of how to create better education simulations
- Improve the overall experience of the end user

If you agree, Virtual Dawn might sell the data gathered to third parties, without any means of understanding what individual or entity were exactly behind the results. The data and



statistics shown are generalized to a level that it is impossible to pinpoint who and when used the simulations. Virtual Dawn does not sell data as its primary business, but at some point it might partner with other companies to further improve its products.

When Virtual Dawn processes your order, Virtual Dawn may send your data to, and also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

### **How does Virtual Dawn store your data?**

Virtual Dawn securely stores your data at the main office in Tampere Finland. The data is encrypted and finally transported to offline storage periodically. Unless the data must be online to offer services, this Information is mainly the subscription lengths and user information.

Virtual Dawn will keep your gathered user information for 5 years. Once this time period has expired, we will delete your data by deleting your information from our systems.

### **Marketing**

Virtual Dawn would like to send you information about products and services of ours that Virtual Dawn thinks you might like.

If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Virtual Dawn from contacting you for marketing purposes or giving your data to other members of Virtual Dawn Group.

If you no longer wish to be contacted for marketing purposes, please send message to [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com)

### **What are your data protection rights?**



Virtual Dawn would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

**The right to access** – You have the right to request Virtual Dawn for copies of your personal data. Virtual Dawn may charge you a small fee for this service.

**The right to rectification** – You have the right to request that Virtual Dawn corrects any information you believe is inaccurate. You also have the right to request Virtual Dawn to complete the information you believe is incomplete.

**The right to erasure** – You have the right to request that Virtual Dawn erases your personal data, under certain conditions. The right to deletion is applicable to all users regardless of region. Please go to EU GDPR page to see the full information: <https://gdpr.eu/right-to-be-forgotten/>

The General Data Protection Regulation (GDPR) gives individuals the right to ask for their data to be deleted and the organization must answer to this request within 1 month. Send your request at [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com) if needed.

**The right to restrict processing** – You have the right to request that Virtual Dawn restricts the processing of your personal data, under certain conditions.

**The right to object to processing** – You have the right to object to Virtual Dawn processing of your personal data, under certain conditions.

**The right to data portability** – You have the right to request that Virtual Dawn transfers the data that we have collected to another organization, or directly to you, under certain conditions.



If you make a request, Virtual Dawn has one month to respond to you. If you would like to exercise any of these rights, please contact Virtual Dawn via email: [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com)

## **Cookies**

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit Virtual Dawn websites, we may collect information from you automatically through cookies or similar technology.

For further information, visit [allaboutcookies.org](http://allaboutcookies.org).

## **How do we use cookies?**

Virtual Dawn uses cookies in a range of ways to improve your experience on Virtual Dawn's website, including:

- Keeping you signed in
- Understanding how you use Virtual Dawn's website
- Offering improved user experience

## **What types of cookies does Virtual Dawn use?**

There are a number of different types of cookies, however, Virtual Dawn's website uses:

- **Functionality** – Virtual Dawn uses these cookies so that we recognize you on Virtual Dawn's website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – Virtual Dawn uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about



your browser, device, and your IP address. Virtual Dawn sometimes shares some limited aspects of this data with third parties for advertising purposes. Virtual Dawn may also share online data collected through cookies with Virtual Dawn's advertising partners. This means that when you visit another website, you may be shown advertising based on your browsing patterns on Virtual Dawn's website.

### **How to manage cookies**

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of Virtual Dawn's website features may not function as a result.

### **Privacy policies of other websites**

The Virtual Dawn website contains links to other websites. Virtual Dawn's Privacy Policy applies only to Virtual Dawn's website, so if you click on a link to another website, you should read their privacy policy.

### **Changes to Virtual Dawn's Privacy Policy**

Virtual Dawn keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 27 April 2021.

### **How to contact Virtual Dawn**

If you have any questions about Virtual Dawn's Privacy Policy, the data Virtual Dawn holds on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact Virtual Dawn.

Email Virtual Dawn at: [contact@virtual-dawn.com](mailto:contact@virtual-dawn.com)

### **How to contact the appropriate authority**



Should you wish to report a complaint or if you feel that Virtual Dawn has not addressed your concern in a satisfactory manner, you may contact Virtual Dawn via email above for further information about the authority with whom to file a possible complaint.