PRIVACY POLICY

To us, OFM Studios GmbH ("OnlineFussballManager" or "we"), the privacy and confidentiality of your data is very important. Your personal information is only collected and used in accordance with the legal provisions of the applicable data protection law. This Privacy Policy is intended to inform you about which personal information we collect as part of your use of the website http://www.onlinefussballmanager.de/ ("platform") and for what purpose the information is used.

We collect and use your personal information exclusively under the provisions of the Data Protection Act of the Federal Republic of Germany. Below, we will inform you about the nature, scope and purpose of the collection and use of personal information. You can access this information at any time on our website at http://www.onlinefussballmanager.de/Impressum.

Responsible entity / contact

For the purposes of the data protection laws, the responsible entity is:

OFM Studios GmbH
Eupener Str. 60
50933 Cologne

If you have any questions or suggestions about the data protection, please send an e-mail to us at the address datenschutz(at)onlinefussballmanager(dot)de.

Object of the data protection

The object of the data protection are the personal data. According to § 3 para 1 BDSG (German Data Protection Act), these are details about the personal or material circumstances of an identified or identifiable natural person. This includes such information as the name, postal address, e-mail address and phone number, but may also include usage data. Usage data consist of data that are required to use our web pages, such as information about the beginning, end and extent of the use of our website and login information.

Collection and use of your data

Automatic data collection

For technical reasons, your Internet browser automatically transmits data when you access web pages by OnlineFussballManager. The following data are stored separately from other data that you may have transmitted to us:

- Date and time of access,
- Browser type / version,
- Operating system,

- URL of the previously visited website,
- Amount of transferred data.

These data are stored only for technical reasons and will not be assigned to a specific person at any time.

Data entered by the user

To make sure that you can use all of the benefits offered by this platform, and especially so you can play our FootballManager game, it is necessary for you to log in. You can either register as a new user or log in with your Facebook account. If you start a new registration, you will have to state your e-mail address, select a password, and accept our General Terms and Conditions as well as the rules of the game. We need this data to set up and manage a user account for you and so that you can use the complete offer of our platform. We also need these and possibly other data to respond to your requests, questions and criticism.

Registration via Facebook

Instead of registering as a new user, you can also use your Facebook account to log in to our platform. Which of these registration options you use is up to you.

The Facebook Connect button is a service of Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, and/or its affiliates and/or legal successors (referred to as "Facebook" below). If you are registered on Facebook, you can use that login information for our platform without having to register again. In that case we will access your e-mail address and password on Facebook. We enter and store this information.

Voluntary information

During the registration, you can also voluntarily enter the TeamId of the manager who has recruited you. The TeamId is the number that uniquely identifies each club. This means that the manager who recruited you will get a bonus if you make a purchase.

Manager game

To actively participate in the OnlineFootballManager game, you have to select a country, club name and a manager name after registration. You can choose imaginary names for the club and manager names.

Forum

In our forum you can ask questions, express criticism and praise, and share information with others. Our forums is a closed user area. Only registered managers can read your posts under the manager name you selected.

Statistical analysis

We evaluate statistical data from platform visits for the purposes of advertising, market research and to customize the platform. We only utilize usage data in this process. In particular, this includes information about the beginning, end and extent of using our website. At no time is it possible for us to assign this information to your person. It is only collected and analyzed statistically.

Of course you alone decide which information to tell us. We are committed to this according to the principle of data minimization. However, if you do not give us certain information, this might lead to your being prevented from using our platform's offers to their full extent.

Measurement of displayed ads and opt-out

We measure data to control ad displays on this platform with technology by nugg.ad AG (www.nugg.ad). Cookies are used for this purpose. Cookies are small text files that are stored locally in the cache of the visitor's web browser. Cookies make it possible to recognize the visitor's browser. If you do not want to have any information associated with your use of our online offer transmitted to nugg.ad for the stated purpose, please click here.

Example of an implementation:

```
<script type="text/javascript">
function optOut() {
blockCall = new Image();
blockCall.src = ,http://eu.nuggad.net/block';
}
function optIn() {
blockCall = new Image();
blockCall.src = ,http://eu.nuggad.net/unblock';
}
</script>
<input type="button" value="opt out" onClick="optOut();" style="width:100px;" />
<input type="button" value="opt in" onClick="optIn();" style="width:100px;" />
```

If you would like to consent to the transmission of this information to nugg.ad again, please click here.
Example of an implementation
```
<script type="text/javascript">
function optOut() {
blockCall = new Image();
blockCall.src = ,http://eu.nuggad.net/block';
}
function optIn() {
blockCall = new Image();
blockCall.src = ,http://eu.nuggad.net/unblock';
}
</script>
<input type="button" value="opt out" onClick="optOut();" style="width:100px;" />
<input type="button" value="opt in" onClick="optIn();" style="width:100px;" />
```
Please note! The cookie may not be deleted as long as the recording of data is disagreed with. If you delete all of the cookies in your browser, you will have to repeat the process.

Transmission of data

In general, your personal information is only transmitted without your express prior consent in the following cases:

- If it becomes necessary for the purpose of investigating illegal platform use or for purposes of prosecution, personal data are forwarded to law enforcement agencies as well as injured third parties, where appropriate. However, this happens only if there is concrete evidence for unlawful or abusive behaviour. Data transmissions may also occur

for the purposes of enforcing terms of use or other agreements. We are also legally obliged to provide information upon request by certain public agencies. These include law enforcement agencies, authorities pursuing offenses associated with fines, and the tax authorities.
-   In the course of developing our business, it may happen that the structure of OnlineFootballManager will change as a result of an alteration of the legal form or if subsidiaries, business units or components are founded, bought or sold. For such transactions, the customer information is forwarded together with the transferred part of the company. With each transfer of personal information to third parties in the abovementioned scope, we will ensure that this is done in accordance with this Privacy Policy and the relevant data protection laws.

Newsletter

We offer you a free newsletter service. In our newsletter we will inform you about new game features and new versions of the OnlineFussballManager. We will also inform you of time-limited campaigns, such as the European Football Championship. In addition, we will remind you via e-mail if you forget to take care of your team for a few days. Our newsletter also lets you know about special offers and products from our partners.

To receive the newsletter via e-mail, you can sign up during the registration of the user account or in the settings of the user account - possibly after entering your email address - by checking off the corresponding field. You will then receive a confirmation e-mail. If you click on the provided link, we will store your e-mail address for the purpose of sending out the newsletter.

You can unsubscribe from the newsletter at any time. Each newsletter contains information on how you can unsubscribe to future newsletters.

Cookies

We store so-called "cookies" in order to offer you a wide range of functions and make it more convenient to use our web pages. "Cookies" are small files that are stored on your computer through your web browser. If you do not want to use "cookies", you can prevent the storage of "cookies" on your computer by selecting the appropriate settings in your Internet browser. Please note that this might limit the functionality and scope of functions of our offer.

Website improvement

Google Analytics

We use Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses socalled "cookies", text files that are stored on your computer and that enable an analysis of your use of the platform. The information created by the cookie about your use of this platform (including your truncated IP address) is transmitted to a Google server in the USA and stored there. Google uses this information to evaluate your use of the platform, to compile reports about the platform activities for us, and to provide other services associated with the platform and the Internet usage. Google might also transfer this information to third parties, if this is legally required or if these third parties are processing this information on behalf of Google.

You can deactivate Google Analytics by using a browser add-on if you do not want this platform analysis. You can download this here: http://tools.google.com/dlpage/gaoptout?hl=de.

Scalable centralized measurement method

Our website uses the "scalable central measuring method" (SCM) from INFOline (https://www.infonline.de) to determine statistical indicators for the use of our services. Anonymous readings are collected in this process. To identify computer systems, the SCM audience measurement uses either a cookie with the identifier "ivwbox.de" or a signature that is generated from different automatically transmitted data from your computer. The IP addresses are not stored and only processed in an anonymous form.

The audience measurement was developed with data protection in mind. The goal of this audience measurement is to statistically determine the intensity of use and number of users of a website. No individual users are identified at any time. Your identity will always stay protected. You will not receive any advertisements through this system.

In case of web offers that are members of the German Audit Bureau of Circulations / Informationsgemeinschaft zur Feststellung der Verbreitung von Werbeträgern e.V. (IVW – www.ivw.eu) or are participating in the "Internet facts" study by the Online Research Study Group / Arbeits-gemeinschaft OnlineForschung e.V. (AGOF – www.agof.de) the usage statistics are published each month by the AGOF and the Media Analysis Study Group / Arbeitsgemeinschaft Media-Analyse e.V. (ag.ma - www.agma-mmc.de), as well as the IVW, and can be accessed at http://www.agof.de, http://www.agma-mmc.de and http://www.ivw.eu.

 In addition to publishing measurement data, the IVW regularly analyzes the SZM method with regard to regulation and privacy-compliant use.

You can find more information on the SZM method on the website of INFOnline GmbH (https://www.infonline.de), which operates the SZM method, the data protection website of the AGOF (http://www.agof.de/datenschutz) and the data protection website of the IVW (http://www.ivw.eu).

You can object to the data processing by the SZM at the following link: http://optout.ivwbox.de

Social Plugins

On our platform we use plugins from the social networks facebook.com, Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, Twitter.com, Twitter Inc., 795 Folsom St., Suite 600, San Francisco CA 94107, USA as well as Google+, Google Inc., 1600 Amphitheatre Parkway Mountain View, California, 94043, USA. You can recognize the plugins according to their respective network logos, e.g. supplemented by the icon of a clenched fist with a raised thumb pointing up, or the addition of "Recommend", "Like" or "Comment". By simply accessing our platform, no direct connection to the servers of the social networks will be established by the Internet browser you use, nor is any data forwarded. If you glide your cursor over the plugins, you will see the information that the plugin must be activated by a click from you first. The data are only transmitted to the respective social networks if you activate this. Only then can you use the plugin functions with a second click, e.g. make your recommendations. If you have activated the plugins, they will transmit various data to the respective social network. This may include:

- Date and time of the visit of the site

- URL of the website that the visitor is currently on
- URL of the website that the visitors had visited previously
- Browser
- Operating system
- Visitor's IP address

If you are logged into Facebook, Twitter or Google+ while visiting our website, it is possible that the provider assigns the visit to your network account. When you use the plugin functions (e.g. clicking the "Like" button, leaving a comment), your browser also transmits this information directly to the respective social network, where it may be stored. You can find out more about the purpose and scope of the data collection as well as the further processing and use of the data by the networks in the privacy policies of Facebook [http://www.facebook.com/policy.php], Twitter [http://twitter.com/privacy] and Google [http://www.google.com/intl/de/policies/privacy/].

Deletion of your data

If your data are no longer required for the above-mentioned purposes, they will be deleted. If any data have to be stored for legal reasons, they will be suspended. In that case the data will no longer be available for further use. If you delete your manager account, your profile will be suspended. If you would like us to delete your data permanently, please contact us with this request at the stated postal address or via e-mail at datenschutz(at)onlinefussballmanager(dot)de. If any data have to be stored for legal reasons, they will be suspended. In that case the data will no longer be available for further use.

Changes to this Privacy Policy

We reserve the right to change this Privacy Policy. The current version of this Privacy Policy can always be accessed at http://www.onlinefussballmanager.de/Impressum.

Current as of: August 10th, 2017