

Privacy Policy & Cookie Policy

Website: <https://smartive.games>

Last updated: 1 June 2026

Effective date: 1 June 2026

1. Who we are (Data Controller)

The controller of your personal data is:

Smartive.app sp. z o.o.

Registered office: Piotrkowska 12, 25-510, Kielce, Poland

Entered into the Register of Entrepreneurs of the National Court Register (KRS) under no.: 0000781911

NIP (Tax ID): PL 9592022938

REGON: 383100710

For all matters relating to the processing of your personal data, including the exercise of your rights, you can contact us at:

- **Email:** gdpr@smartive.app
- **Postal address:** as above

We have not appointed a Data Protection Officer (DPO), as we are not required to do so. You may direct any privacy enquiry to the contact details above.

This website ("Site") is the publishing platform of Smartive.games (a Smartive.app brand), showcasing video games published by Smartive.games and related information. References to "we", "us" and "our" mean Smartive.app sp. z o.o. as the data controller for this Site.

2. Scope of this policy

This policy explains how we collect, use, store and protect personal data when you visit <https://smartive.games>, and how we use cookies and similar technologies.

It does not apply to:

- The store pages for games we publish on platforms such as Steam, which are operated by the relevant operator (e.g. Valve Corporation) under its own privacy policy.
- Third-party platforms we link to (e.g. YouTube, Discord, social media), which process your data under their own policies.

We process personal data in accordance with **Regulation (EU) 2016/679 of 27 April 2016 (GDPR)** and applicable Polish law.

3. What data we collect and why

We aim to collect as little personal data as possible. Depending on how you use the Site, we may process the following:

3.1 Website usage data (analytics)

- **Data:** IP address (often truncated/anonymised), device and browser type, operating system, referring URL, pages visited, approximate location, interaction events.
- **Purpose:** to understand how the Site is used and to improve it.
- **Legal basis:** your consent (Art. 6(1)(a) GDPR), collected via our cookie banner, where analytics rely on cookies or similar technologies.

3.2 Newsletter / wishlist & launch updates (if applicable)

- **Data:** email address and any information you voluntarily provide.
- **Purpose:** to send you updates about games published by Smartive.games (development news, demo availability, launch dates).
- **Legal basis:** your consent (Art. 6(1)(a) GDPR). You can withdraw consent at any time by using the unsubscribe link in any message or by contacting us.

3.3 Contact form / direct email (if applicable)

- **Data:** name, email address, the content of your message.
- **Purpose:** to respond to your enquiry.
- **Legal basis:** our legitimate interest in responding to enquiries (Art. 6(1)(f) GDPR), or steps taken at your request prior to entering into a contract (Art. 6(1)(b) GDPR) where relevant.

3.4 Server logs

- **Data:** technical data automatically logged by our hosting provider (IP address, request time, browser data) for security and stability.
- **Purpose:** ensuring the security, integrity and availability of the Site.
- **Legal basis:** our legitimate interest (Art. 6(1)(f) GDPR).
- Any in-game data processing, which is governed by the separate terms of the relevant game where applicable.

We do not knowingly collect data from children under the age of 16 without verifiable parental consent. We do not carry out automated decision-making or profiling that produces legal or similarly significant effects on you.

4. Cookies and similar technologies

4.1 What are cookies?

Cookies are small text files placed on your device when you visit a website. Similar technologies include local storage, pixels and SDKs. They allow the Site to function correctly, remember your preferences, and help us measure usage.

4.2 Categories of cookies we use

Category	Purpose	Consent required?
Strictly necessary	Enable core functionality such as page navigation, security and storing your cookie preferences. The Site cannot function properly without them.	No (Art. 6(1)(f) GDPR)
Analytics / performance	Help us understand how visitors use the Site so we can improve it.	Yes (consent)
Functional	Remember choices you make (e.g. language) to provide enhanced features.	Yes (consent)
Marketing	Used to measure the effectiveness of campaigns and, where applicable, deliver relevant content.	Yes (consent)

4.3 List of cookies

Name	Provider	Type	Purpose	Expiry
_ga	Google	Analytics	Core Google Analytics 4 cookie – identifies the user/device	2 years
ga<container-id>	Google	Analytics	Stores GA4 session state (session number, duration, engagement)	2 years
NEXT_LOCALE	This site	Strictly necessary	Stores the selected language version of the Site	1 year
cookie-consent	This site	Strictly necessary	Remembers your choice from the cookie banner (accept/decline analytics)	Persistent (until cleared in your browser)
youtube-cookie-consent	This site	Strictly necessary	Remembers whether you've agreed to load embedded YouTube videos (and their cookies)	Persistent (until cleared in your browser)

4.4 Third-party / embedded content

Pages on this Site may include embedded content such as:

- **YouTube trailers** (Google Ireland Ltd.)
- **Steam widgets** (Valve Corporation)
- **Social media links or embeds** (e.g. X, Discord, Bluesky)

When you interact with embedded content, the relevant third party may set its own cookies and receive data about your visit. We recommend reviewing those providers' privacy policies. Where required, such embeds are loaded only after you grant consent.

4.5 Managing your cookie preferences

- You can accept or reject non-essential cookies via the **cookie banner** shown on your first visit, and change your choice at any time via <https://smartive.games>
- You can also block or delete cookies through your **browser settings**. Disabling certain cookies may affect how the Site works.

5. Who we share your data with

We may share your personal data with:

- **Hosting provider:** Zenbox – to host and serve the Site.
- **Analytics provider:** Google – where you have consented.
- **Email / newsletter provider:** MailerLite – to deliver updates, if applicable.
- **IT and service providers** acting as processors on our behalf under a data processing agreement.
- **Public authorities**, where we are legally required to do so.

We do not sell your personal data.

6. International data transfers

Some of our providers may process data outside the European Economic Area (EEA), for example in the United States. Where this occurs, we ensure an adequate level of protection through appropriate safeguards under the GDPR, such as:

- the EU Commission's adequacy decisions (e.g. the EU-US Data Privacy Framework, where the provider is certified), or
- Standard Contractual Clauses (SCCs) approved by the European Commission.

You can request more information about these safeguards using the contact details in Section 1.

7. How long we keep your data

Data	Retention period
Analytics data	For the lifetime of the relevant cookie / as configured with the analytics provider (typically up to 24 months)
Newsletter subscription	Until you unsubscribe or withdraw consent
Contact form / email correspondence	For as long as necessary to handle your enquiry, and thereafter as required to defend or pursue legal claims
Server logs	3 months

After the applicable period, data is deleted or anonymised.

8. Your rights

Under the GDPR, you have the right to:

- **Access** your personal data and obtain a copy of it.
- **Rectify** inaccurate or incomplete data.
- **Erasure** ("right to be forgotten"), in certain circumstances.
- **Restrict processing**, in certain circumstances.
- **Data portability** – receive your data in a structured, commonly used, machine-readable format.
- **Object** to processing based on our legitimate interests.
- **Withdraw consent** at any time, where processing is based on consent. Withdrawal does not affect the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, contact us using the details in Section 1. We will respond within one month, as required by the GDPR.

Right to lodge a complaint

If you believe your data is processed unlawfully, you have the right to lodge a complaint with the Polish supervisory authority:

Prezes Urzędu Ochrony Danych Osobowych (President of the Personal Data Protection Office, UODO)

ul. Stawki 2, 00-193 Warsaw, Poland

Website: <https://uodo.gov.pl>

9. Data security

We apply appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, alteration or disclosure, including encrypted connections (HTTPS), access controls and the use of vetted processors. No method of transmission over the internet is completely secure, and we cannot guarantee absolute security.

10. Is providing data mandatory?

Providing personal data is voluntary. However, some functionality (e.g. subscribing to updates or contacting us) requires the relevant data; without it, we cannot provide that specific service.

11. Changes to this policy

We may update this policy from time to time, for example to reflect changes in law, technology or our practices. The current version is always available on this Site, with the "Last updated" date shown at the top. Material changes will be communicated where appropriate.

12. Contact

For any questions about this policy or your personal data:

Smartive.app sp. z o.o.

Email: gdpr@smartive.app

Address: ul. Piotrkowska 12, 25-510 Kielce, Poland