

Thinking Games – Privacy Policy

Last modified: 16 August 2026

Introduction

Thinking Games Inc. and its related entities (“**Thinking Games**”, “**we**”, “**our**” or “**us**”) operate free-to-play games distributed via mobile applications (“**Apps**”) and through our website Thinking.games (“**Website**”; together – the “**Services**”).

This Privacy Policy (“**Policy**”) is designed to help you understand how we collect, store, use and share your personal data. This Policy applies whenever you visit our Website or otherwise access or use any of our Services.

We strongly urge you to read this Policy and make sure that you fully understand and agree to it. By using our Services, you acknowledge that you have reviewed this Policy and agree to be bound by its terms.

For any questions or concerns, please contact us via our email address: Privacy@thinking.games.

This Policy describes the following –

1. What types of personal data we collect
2. Tracking technologies
3. Why we process your personal data
4. With whom we share your personal data
5. Marketing and Advertising
6. Your privacy rights
7. Transfer of personal data
8. How we protect your data
9. Minors
10. Retention
11. Updates to this Policy
12. Controlling version
13. Contact us

1. What types of personal data do we collect?

We collect personal data about you, which refers to any information that could potentially identify you through reasonable means. This section outlines how and when we collect and process personal data about you.

1.1. Account information:

When you begin using our Services, we may collect a username or alias, as well as device identifiers. You may also voluntarily provide additional information, such as a photo. We do not require your full name or phone number to use our Services.

1.2. Usage information:

When you use our Services, we collect information about your interaction with our Services. Such information includes data pertaining to your activities on our Services, as well as information generated when you interact with our Apps or Website (for instance, in-game actions and decisions, game progress and scores, time spent on each puzzle etc.)

1.3. Advertising Data:

We may collect data related to your interactions with advertisements displayed within our games, including but not limited to: ads viewed, ad click-through data, ad engagement duration, and ad preference indicators. This data is used to serve relevant advertisements and measure ad performance. We share your personal data, including identifiers, usage data, and advertising data, with third-party partners who may use this data for their own purposes, including targeted advertising, analytics, and market research.

1.4. Identifiers and technical information:

When you use our Services, we may collect technical information such as IP address, device identifiers (e.g., IDFV for iOS devices and Android ID for Android devices), persistent pseudonymous identifiers linked to your device or account, information about your device and connection, including user agent, connection type, timestamp, system language, device model, screen resolution and settings, battery level, available storage space, time zone, operating system, and mobile app version. We may also collect information about your device's graphics capabilities and performance metrics relevant to delivering an optimal gaming experience.

1.5. Communication information:

When you contact us via email, we collect the personal data you provide, which includes your name, email address, and any other information you choose to provide.

We do not knowingly collect, process or disclose any sensitive personal data.

2. Tracking technologies

When you visit or access our Services, we use cookies, pixels, beacons, local storage, in-game analytics SDKs, and similar technologies ("**Tracking Technologies**"). These Tracking Technologies allow us to automatically collect information about you, your device, and your in-game behavior, in order to enhance your gaming experience, improve our Services' performance, perform analytics, customize your experience, and optimize game content and difficulty to better correspond with your interests and skill level.

2.1. What types of Tracking Technologies do we use?

When you use or access our Services, we use the following categories of Tracking Technologies:

- (a) Strictly necessary Tracking Technologies: these Tracking Technologies are automatically placed on your computer or device when you access or take certain actions on our Services.

These Tracking Technologies are essential to enable you to navigate around and use the features of our Services.

- (b) Functionality Tracking Technologies: these Tracking Technologies allow our Services to remember choices you make (such as your language) and provide enhanced and personalized features. For example, these Tracking Technologies are used for authentication (to remember when you are logged-in) and support other features of our Services; and
- (c) Performance Tracking Technologies: these Tracking Technologies collect information about your online activity (for example the duration of your visit to our Services), including behavioral data and content engagement metrics. These Tracking Technologies are used for analytics, research and statistics (based on aggregated information).
- (d) Tracking and Advertising Tracking Technologies: These Tracking Technologies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign. The Tracking Technologies remember the websites you visit and that information is shared with other parties such as advertisers and publishers. Publishers, advertisers, and third-party ad networks may also utilize Tracking Technologies or similar technologies to deliver ads and monitor the performance of such ads.

2.2. How and by who are Tracking Technologies stored on your device?

We store Tracking Technologies on your device when you visit or access our Services – these are called "First Party Tracking Technologies". In addition, Tracking Technologies are stored by other third parties (for example, our analytics service providers, business partners and advertisers), who run content on our Services – these are called Third-party Tracking Technologies. Both types of Tracking Technologies may be stored either for the duration of your visit on our Services or for repeat visits.

You can manage your Tracking Technology preferences through your browser settings include changing your browser settings to send a "Do-Not-Track" signal. In such cases, your browser will send us a special signal to stop tracking your activity. However, please note that certain features of the Services may not work properly or effectively if you delete or disable cookies.

Below is a list of useful links that can provide you with more information on how to manage your cookies:

- (a) [Google Chrome](#);
- (b) [Mozilla Firefox](#);
- (c) [Safari \(Desktop\)](#);
- (d) [Safari \(Mobile\)](#);
- (e) [Android Browser](#); and
- (f) [Microsoft Edge](#)

3. Why we process your personal data

Any personal data we collect is being used in a way that is consistent with this Policy, and is used as follows:

Purpose and Scope of Collected Data

Legal Basis

Provision of our Services. We use your personal data, including your device identifiers, user identifier, and gameplay data, to provide you with our core service: AI-tailored games personalized to your individual gameplay behavior. This may include generating and delivering personalized game content, adapting difficulty levels, presenting theme variants based on your preferences, and maintaining your persistent gameplay profile across sessions.

The legal bases for processing this data are the performance of our contractual obligations towards you (delivering the personalized gaming experience that constitutes our Services) and our legitimate interests. Our legitimate interest in this case is the provision of AI-tailored gaming experiences to our users.

Personalization. Thinking Games profiles users based on gameplay behavior, usage patterns, device information, and advertising interactions to build interest segments. These profiles are used to select and deliver personalized experiences, including advertisements, and to share audience insights with advertising partners.

Improve our Services. We collect and analyze information about you and your usage of our Services, including gameplay data, for the purposes of usability, quality, functionality, improvement and effectiveness of our Services (including training our AI model), debugging to identify and repair errors, undertaking internal research for technological development and demonstration, developing new games, and advance our game generation technology.

The legal basis for processing this data is our legitimate interest. Our legitimate interests in this case are providing and improving our Services.

Marketing and advertising. We use personal data in order to provide you with advertisements (either on our Services or on other third-party assets), including personalized and non-personalized advertising as well as direct marketing. This processing also includes sharing data with third parties for their own advertising and analytics purposes, creating audience segments and interest profiles based on gameplay and usage data, and measuring and optimizing advertising campaigns across platforms.

The legal bases for processing this data are your consent (where legally required) and our legitimate interests. Our legitimate interests in this case are providing you with tailored services, content and advertisements that better correspond with your interests.

Compliance with applicable laws; assistance to law enforcement agencies; exercising and defending legal claims. We may process your personal data in order to comply with our legal obligations under applicable laws and to exercise legal rights.

The legal basis for processing this data is compliance with our legal obligations and our legitimate interests. Our legitimate interests in this case are compliance with our legal obligations, assisting law enforcement agencies and defending and exercising our legal claims.

4. With whom do we share your personal data?

We may share your personal data with:

4.1. Affiliated companies:

We share Personal Data internally within our affiliated companies and subsidiaries, for the purposes described in this Policy.

4.2. Payment processors:

We do not collect your payment information; this information is directly collected by our trusted third party payment processors, for the purpose of facilitating your payments when using our Services. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf.

4.3. Service providers:

Service providers working on our behalf and who need access to certain personal data in order to provide their services to us. These companies include, but are not limited to, cloud storage providers, analytics services, fraud prevention etc.

4.4. Law enforcement agencies:

We may disclose some data about you to government or law enforcement officials or private parties. The disclosure will be made in our sole discretion, as we believe it necessary or appropriate to respond to claims and legal procedures (including but not limited to subpoenas), to protect our or a third-party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual's personal data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

4.5. Auditors and advisers:

We share your data with our external auditors, advisors and professional service providers (e.g., lawyers, accountants, insurers etc.) to ensure our compliance with regulatory requirements and industry standards, auditing, managing disputes etc.

4.6. Mergers and acquisitions:

We may transfer or otherwise share your data in case of entering into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets.

5. Marketing and advertising:

We work with third-party advertising technology partners, such as ad networks, demand-side platforms, and measurement providers, to serve and measure advertisements. These partners may collect data directly from users' devices through their own Tracking Technologies integrated into the Services.

We also use your personal data ourselves, or via third parties on our behalf, for the purpose of providing you with promotional materials, ads, products, services, websites and applications which relate to our Services, which we believe may interest you.

You can decline receiving direct marketing offers from us at any time, by contacting us at Privacy@thinking.games.

Please note that even if you unsubscribe from our marketing list, we can continue to send you updates and notifications related to the Services.

6. Your privacy rights

6.1. Depending on the jurisdiction in which you reside, you may have certain rights under relevant applicable laws regarding the collection and processing of your personal data. To the extent these rights apply and concern you, you can contact us via the contact details available below and request to exercise the following rights.

6.1.1. Rights of access to your personal data:

You may have the right to receive confirmation as to whether or not personal data concerning you is being processed, and access your stored personal data, together with supplementary information.

6.1.2. Right of data portability:

You may have the right to request us to move, copy and transfer your personal data easily from one IT environment to another, in a safe and secure way, without affecting its usability.

6.1.3. Right of rectification:

You may have the right to request rectification of your personal data in our control in the event that you believe the personal data held by us is inaccurate, incomplete or outdated.

6.1.4. Right of deletion/erasure:

You may have the right to request that we erase or delete personal data held about you at any time.

6.1.5. Right to restriction or objection to processing:

You may have the right to request that we restrict or cease to conduct certain personal data processes at any time.

6.1.6. Right to withdraw your consent:

To the extent we process personal data on the basis of your consent, you may have the right to withdraw your given consent at any time.

6.1.7. Right not to be subject to automated decision making:

You may have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects you.

6.1.8. Right to opt-out of the sale or share of personal data:

Where we sell or share your personal data for behavioral advertising purposes, you may have the right to submit a request to opt-out of the sale or share of your personal data, depending on the location you reside. Where you are entitled to exercise such right, we may continue disclosing some personal data to our partners to help us perform business-related functions such as, but not limited to, providing the Services, ensuring that the Services are working correctly and securely, providing aggregate statistics and analytics and preventing fraud.

6.1.9. Right to non-discrimination:

You may have the right to be free from any discrimination against exercising your rights, such as offering you different pricing or products, or by providing you with a different level or quality of services, based solely upon your request.

6.1.10. Right to lodge a complaint:

All requests, complaints or queries may be addressed to us to the following email address: Privacy@thinking.games. We will consider any requests, complaints or queries and provide you with a reply in a timely manner. We take our obligations seriously and we ask that any concerns be brought to our attention first, so that we can try to resolve them. If you are unsatisfied with our response, you can lodge a complaint with the applicable data protection supervisory authority.

Please note that these rights are not absolute and may be subject to our own legitimate interests and regulatory requirements. You are welcome to contact us with any questions or requests through our contact details below.

7. Transfer of personal data

Certain aspects of our operations, such as our referrals to different platform operators, are handled globally. Thus, any information that we collect, disclose or share, including your personal data, can be stored and processed in various jurisdictions around the world for the purposes detailed in this Policy.

To the extent that the GDPR or UK GDPR are applicable, we will only transfer or share your Personal Data to data recipients:

- a. located in the EEA or in the UK;
- b. located in non-EEA countries or UK which have been approved as providing adequate level of data protection; or
- c. who have entered into legal agreements ensuring an adequate level of data protection.

8. How we protect your data

We implement administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. While we seek to protect your information to ensure that it is kept confidential, we cannot guarantee the security of information. You should be aware that there is always some risk involved in transmitting information over the internet and that there is also some risk that others could find a way to thwart our security systems. Such breaches can lead to things such as reputational harm, fraud or identity theft. Therefore, we encourage you to exercise discretion regarding the Personal Data you choose to disclose. If you feel that your privacy was treated not in accordance with our Policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly via our contact details available below.

9. Minors

We do not knowingly collect or solicit personal data from anyone under the age of 13. Our Services are not directed at children under 13. By accessing, using, or interacting with our Services, you represent that you are at least 13 years of age or the minimum age required for consent under the laws of your jurisdiction, whichever is higher, or that you are accessing the Services with verifiable parental or legal guardian consent where required by applicable law.

For users aged 13 to the age of majority in their jurisdiction, parental or legal guardian consent may be required or recommended depending on applicable local law.

In the event we learn that we have inadvertently gathered personal information from a child under the age of 13, we will take reasonable measures to promptly delete such information from our records in a secure manner. If you believe that we may have collected any information from or about a child without proper consent, please let us know at Privacy@thinking.games.

10. Retention

We retain personal data for as long as reasonably necessary to provide the Services and fulfill the purposes described in this Policy, and as necessary to comply with applicable legal obligations, resolve disputes, enforce our policies, protect our rights, and support other legitimate business needs. When determining appropriate retention periods, we consider the type and sensitivity of the information, the purpose for which it was collected and is used, applicable legal and regulatory requirements, and our legitimate business and operational needs, including maintaining records and addressing security, fraud prevention, and accountability matters. We periodically review our retention practices and retention periods to assess whether personal data continues to be required for these purposes. When personal data is no longer required, we delete or anonymize it in accordance with our internal policies and applicable requirements. You may request deletion of your personal data by contacting us through the details provided in this Policy; we will consider and handle such requests subject to applicable legal requirements.

11. Updates to this Policy

From time to time, Thinking Games reserves the right to modify the Policy through:

- (i) posting a modified version on the Services. Such modified version will take effect immediately upon being posted and you agree to be bound by such modifications;
- (ii) asking that you accept the modified Policy. Such modified version will take effect immediately upon your acceptance;
- (iii) posting a notice about the modifications on the Services. Such modifications will take effect immediately upon the notice being posted and you agree to be bound by such modifications; or
- (iv) sending you a notification via the e-mail address associated with your User Account at the time of such modification. Such modification will take effect upon your continued use of the Thinking Games Services.

If you do not agree with the modified Policy, your sole remedy will be to terminate your User Account and immediately cease accessing and using the Services.

We reserve the right to change this Policy at any time. The most current version will always be posted through our Services (as reflected in the “Last Updated” heading). You are advised to check for updates regularly. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Policy.

12. Controlling version

This Policy has been drafted in English, serving as the original and controlling version of this Policy. Any translations of this Policy into other languages are provided for convenience only and shall not dictate the meaning or application of this Policy. In the event of any discrepancy between the meanings of any translated versions of the Policy and the English language version, the interpretation of the English language version shall prevail.

13. Contact us

If you have any questions about this Policy, please contact us at: Privacy@thinking.games.