

2. PRIVACY POLICY

Effective Date: 10.07.2025

Last Updated: 10.07.2025

Who We Are

HON STUDIOS Yazılım Teknolojileri A.Ş. ("HON STUDIOS," "we," "us," or "our") develops and operates trading card games including **Luminoria Tactics ("Luta")**. This Privacy Policy outlines how we collect, use, disclose, and protect your personal information.

Age Requirements

Our games are designed for users aged 12 and older. We do not knowingly collect personal information from children under 12. Users under 18 require parental or guardian consent to use our services. We comply with **COPPA** (Children's Online Privacy Protection Act) by not knowingly collecting data from children under 13 without verified parental consent.

Information We Collect

Account Information:

- Username and display name
- Email address (for account management and communications)
- Date of birth (for age verification purposes)
- Account preferences and settings

Gameplay Data:

- Game progress, levels completed, achievements
- Cards collected, deck configurations, battle history
- In-game purchases, virtual currency transactions
- Friends lists, social interactions
- Tournament participation, rankings

Device and Technical Information:

- Device identifiers (e.g., IDFA, Android ID)
- Operating system type and version
- App version and build information
- Network connection type, carrier
- Device performance metrics, crash reports

Usage Analytics:

- Session duration and frequency
- Feature usage, navigation patterns
- Performance metrics, error logs
- Participation in A/B testing

How We Use Your Information

Providing Game Services:

- Creating and managing your account
- Enabling gameplay, matchmaking
- Processing in-app purchases
- Providing customer support
- Delivering updates, new features, and content

Improving Our Games:

- Analyzing gameplay data for balancing and feature development
- Identifying and resolving technical issues
- Conducting A/B testing

Ensuring Fair Play:

- Detecting and preventing cheating, fraud, abuse
- Enforcing compliance with Terms of Service

Marketing and Communications:

- Sending essential game updates, announcements
- Providing information on new features or events
- Delivering promotional materials (with your consent)
- Conducting surveys and gathering feedback

Information Sharing and Disclosure

With Other Players:

- Username, profile, and game statistics
- Leaderboard rankings, tournament results

Service Providers:

- Payment processors
- Cloud infrastructure providers
- Analytics and customer support services

Legal Obligations:

- Compliance with applicable laws or legal processes
- Protecting our rights, property, and safety
- Preventing fraud, illegal activities

International Data Transfers

Your personal information may be stored and processed in countries outside of your residence, including but not limited to the European Union, the United States, and Turkey. We ensure that appropriate safeguards (such as Standard Contractual Clauses) are in place for international transfers in compliance with **GDPR** and other applicable laws.

Your Rights and Choices**Under GDPR (EU Residents):**

- Right to access personal data
- Right to rectification of inaccurate data
- Right to erasure ("right to be forgotten")
- Right to restrict processing
- Right to data portability
- Right to object to processing
- Right to lodge a complaint with a supervisory authority

Under CCPA/CPRA (California Residents):

- Right to know what personal data we collect
- Right to request deletion of personal data
- Right to opt-out of data sales/sharing (We do not sell your data)
- Right to non-discrimination for exercising privacy rights

Account Management:

- Access, review, or update your personal information
- Request account deletion at any time
- Withdraw consent for marketing communications

Data Portability:

- Request a copy of your personal data in a portable format

Marketing Preferences:

- Opt-out of promotional emails
- Manage push notifications

- Control social media integration settings

Data Security

We employ industry-standard security measures, including:

- Encryption of sensitive information
- Secure server infrastructure
- Regular security audits
- Access control measures
- An incident response plan for managing data breaches

Children's Privacy (Under 13)

We do not knowingly collect data from children under 13. If we discover such collection, we promptly delete the information. Parents may contact us at privacy@honstudios.xyz to review, modify, or delete their child's data.

Beta Testing

If you participate in any beta testing programs, additional Beta Testing Terms and confidentiality requirements apply. We may collect gameplay data and feedback for development purposes.

Accessibility Commitment

We are committed to making **Luminoria Tactics** accessible to all users. We follow accessibility best practices and continually work towards compliance with **WCAG guidelines**.

Contact Information

- **Privacy-related inquiries:** privacy@honstudios.xyz
- **Legal inquiries:** legal@honstudios.xyz
- **General support:** support@honstudios.xyz

Address:

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Changes to this Policy

We may update this Privacy Policy periodically to reflect changes in our practices, legal requirements, or game features. Significant updates will be communicated through the game or via email notifications.

