

# Privacy Policy & Cookie Policy

**Website:** <https://ditherparadox.com>

**Last updated:** 5 June 2026

**Effective date:** 5 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](mailto: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**") promotes the video game *Dither Paradox*, developed by **Negative Prompt Studio** and published by Smartive.games (Smartive.app brand). 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://ditherparadox.com>, and how we use cookies and similar technologies.

It does **not** apply to:

- The Steam store page for *Dither Paradox*, which is operated by 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.
- Any in-game data processing, which is governed by separate terms where applicable.

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 *Dither Paradox* (development news, demo availability, launch date).
- **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).

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?
<b>Strictly necessary</b>	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)
<b>Analytics / performance</b>	Help us understand how visitors use the Site so we can improve it.	Yes (consent)
<b>Functional</b>	Remember choices you make (e.g. language) to provide enhanced features.	Yes (consent)
<b>Marketing</b>	Used to measure the effectiveness of campaigns and, where applicable, deliver relevant content.	Yes (consent)

### 4.3 Indicative list of cookies

**Note:** Replace this section with the actual cookies set on your Site. Audit your live Site (e.g. via your browser dev tools or a cookie scanner) and list each cookie below.

Name	Provider	Type	Purpose	Expiry
cookie_consent	This site	Strictly necessary	Stores your cookie preferences	12 months
[_ga / _ga_*]	Google Analytics ( <i>if used</i> )	Analytics	Distinguishes users / sessions	up to 24 months
[plausible_*]	Plausible ( <i>if used – cookieless</i> )	Analytics	Privacy-friendly usage statistics	n/a

Name	Provider	Type	Purpose	Expiry
(Table content is redacted)				

## 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 <http://ditherparadox.com>
- 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](mailto:gdpr@smartive.app)

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