TUNNEL VISION S.r.l.

operating under the brands Turbolento Games · turbolento publishing · Fate Rate

PRIVACY POLICY

Provided under Articles 13, 14 and 22 of Regulation (EU) 2016/679 (GDPR)

Version 2.0 — October 2026. Replaces version 1.0 of 01/01/2024.

This is a translation. In case of any discrepancy, the Italian version prevails.

1. Data controller

The controller of your personal data is Tunnel Vision S.r.l., registered office at Via Messina 30, 00198 Rome, Italy, VAT and tax code 16135501001, REA RM-1636827. The Company also operates under the trade names and brands “Turbolento Games”, “turbolento publishing” and “Fate Rate” (the “Controller”, “we” or the “Company”).

For any question about how we process your data, write to info@tunnelvision.it or, by certified e-mail (PEC), to tunnelvision@legalmail.it. The Company has not appointed a Data Protection Officer (DPO).

2. Who this policy is for and what it covers

This policy explains how we process the personal data of people who visit our websites, play our games or use their online features and in-game purchases, write to our support, take part in our Discord servers or interact with our social media channels.

It covers the games the Company publishes directly:

- Lootborne (Steam);
- Slowly Sliding Ducks (Steam);
- Placid Plastic Deck (Steam);
- Unemployment Simulator 2018 (Steam);
- Placid Plastic Desktop (Steam);
- Starsand (Steam), from 4 November 2026;
- Placid Plastic Duck Simulator for mobile devices (Apple App Store and Google Play).

Some of our games are published by third-party publishers: Placid Plastic Duck Simulator for PC and consoles and Placid Plastic Duck VR by Team17 (Everplay), and Starsand until 3 November 2026 by Toplitz Productions. For the data those publishers process, their own privacy policy applies.

Our games are bought and downloaded through third-party platforms (Valve's Steam, the Apple App Store, Google Play and the other platforms where they are available). The platforms are independent controllers of the registration, account and payment data they collect directly, under their own privacy policies. From them we mostly receive aggregated sales and usage data and, for games with online features, the identifiers described in section 4.

3. Categories of data we process

Depending on how you interact with us, we may process:

- platform identifiers: your Steam ID and the name you use on Steam, for games with online features (section 4);
- game data: progress, statistics, inventory, match results, leaderboard positions;
- usage and diagnostic data: in-game events, session length, device characteristics, errors and crashes;
- in-game purchase data: the pack you bought and the order dates. Payment is handled by the platform: we do not see your card details;

- security and anti-cheat data: automatic reports of anomalous behaviour, sanctions, appeals;
- contact data and content you send us: name, e-mail address, text and attachments of support requests and bug reports;
- content posted on our Discord servers, on the Steam forums and on our social media channels;
- browsing data on our websites: IP address, browser type, pages visited, date and time;
- marketing data: e-mail address and preferences, if you sign up for a newsletter we may offer.

We do not sell personal data and we do not use it for personalised advertising.

4. Game by game

4.1 Lootborne

- Account. You sign in with your Steam account. The game creates an account on Microsoft PlayFab servers linked to your Steam ID and uses your Steam name as your name.
- What other players see. Your Steam name, level and scores on the leaderboards; the "ghost" of your character used in asynchronous PvP (name, level, stats, items, abilities and ranking points); the challenge logs, i.e. who challenged you and whom you challenged, with name and level (up to 50 entries per player).
- What we keep on our servers. Progress and playtime, your inventory and the log of tradable items, anti-cheat data and any sanctions.
- Save file. The main save file is on your PC and in Steam Cloud. We cannot see it and we do not store it.
- Gameplay statistics. The game sends in-game events linked to the pseudonymous identifier of your PlayFab account. They are kept for a limited period on PlayFab and copied to an archive on Microsoft Azure, where we use them to analyse and improve the game. We delete the copies we keep for analysis after 24 months. You can turn them off with the "Gameplay analytics" option in the settings: it stops these events, not the leaderboards, the PvP ghost or the anti-cheat checks, which the game needs to work.
- Anti-cheat. The anti-cheat system automatically checks game data and, when it detects certain violations, may reset your PvP ranking points, suspend or ban the account automatically. See section 12.
- Steam Marketplace. The items you obtain and trade on the Marketplace are in your Steam inventory, managed by Valve. Our servers read the inventory to check which items you own.

4.2 Slowly Sliding Ducks

- Account. On first launch the game creates an account on our server, hosted by a hosting provider, linked to your Steam ID and your Steam name. The game generates a technical credential by itself to connect to the account.
- What we keep on our server. Experience, coins and Duck Gems; the cosmetics you own and how you obtained them; match results, with the finishing order of the participants; matches, parties and quest progress; automatic cheat reports; Duck Gems orders (pack and dates, without amounts or payment data, which stay with Steam).
- Leaderboard. The leaderboard is based on experience and is visible to other players.
- Online matches and voice chat. Matches and voice chat go through the servers of Photon (Exit Games GmbH), which process your IP address to route the connection. In voice chat your Steam name is your visible name. Voice is transmitted in real time: we do not record it.
- Statistics. The game uses Unity Analytics (Unity Technologies) to collect usage and diagnostic data. On first launch a notice explains what data it collects, and you can turn collection off at any time with the "Gameplay data" switch in Settings, General section: from then on, collection stops. Crash reports from the game (Unity Cloud Diagnostics) stay on even with the switch off. Events are linked to a random identifier of your installation of the game, created by Unity, and not to your account or your Steam ID: for

this reason we cannot find your data to give it to you or delete it (Art. 11 GDPR), and turning the switch off stops collection but does not delete data already collected. Events do not contain your Steam name, chat text, voice or amounts paid: of chat messages and emotes we only count how many you send.

- In-game reports. The text you write in the report form reaches us by e-mail and is not stored on the server. If you attach the game's log file, we also receive the data it contains: Steam ID, Steam name and match messages.

4.3 Placid Plastic Deck, Unemployment Simulator 2018, Placid Plastic Desktop and Starsand

These are single-player games, with no account with us and no online features run by the Company. Save files are on your device and, if you use it, in Steam Cloud. If a game sends diagnostic or statistical data, it is processed by one of our analytics providers (section 7) in pseudonymous form, for the purposes and periods in section 5.

Placid Plastic Deck uses Unity Analytics (Unity Technologies) to collect usage and technical data: for example language and operating system, device and graphics card model, session length and progress in the game, such as tasks completed and card games won or lost. The data do not include your name or your Steam ID. Events are linked to a random identifier of your installation of the game, created by Unity, and not to your Steam account: for this reason we cannot find your data to give it to you or delete it (Art. 11 GDPR). The game has no option to turn collection off.

4.4 Placid Plastic Duck Simulator for mobile devices

Apple and Google give us aggregated data on sales, installs and app stability. Your account and payment data are processed by them, under their own privacy policies.

5. Purposes, legal bases and retention

Purpose	Legal basis (Art. 6 GDPR)	How long
Providing the games and their online features: account, online saves, leaderboards, PvP, multiplayer, voice chat, inventory and in-game purchases	Performance of a contract (Art. 6.1.b)	As long as the account exists or the game stays online, unless deleted on request
Anti-cheat, security, fraud prevention, handling sanctions and appeals	Legitimate interest in a fair and secure game (Art. 6.1.f) and performance of a contract (Art. 6.1.b)	For the life of the account; sanction and appeal logs as long as needed to handle appeals and disputes
Gameplay statistics and diagnostics, to fix bugs and improve the games	Legitimate interest (Art. 6.1.f), which you can object to at any time (in Slowly Sliding Ducks with the switch in Settings)	As long as needed for the analysis, in pseudonymous form (for Lootborne, at most 24 months); aggregated data may be kept indefinitely
Support, bug reports and contact requests	Performance of a contract or legitimate interest (Art. 6.1.b/f)	As long as needed to handle the request, then archived for possible disputes
Moderation of our Discord servers and forums	Legitimate interest (Art. 6.1.f)	As long as the content stays published or is needed for moderation
Newsletter and promotional communications	Consent (Art. 6.1.a)	Until consent is withdrawn
Legal, accounting and tax obligations, including in-game purchases	Legal obligation (Art. 6.1.c)	For the periods required by law (usually 10 years)

Providing the data needed for the game and for legal obligations is necessary: without it, the game or the requested feature cannot work. Providing data for marketing purposes is optional.

Where processing is based on legitimate interest, we have assessed that it does not override your rights: we use pseudonymous identifiers where possible, we do not process special categories of data and you can object at any time (section 9).

6. Support, Discord and social media

- When you write to the support addresses shown in the games and on the Steam pages, we process your e-mail address, the text and the attachments to reply and solve the problem.
- To read and sort requests and to prepare replies we also use assistants based on artificial intelligence (Claude, by Anthropic), acting as our processors. Decisions that affect you, such as an in-game compensation or the outcome of an appeal, are taken by a person at the Company.
- On our Discord servers we read and moderate messages, also with the help of bots. Discord is an independent controller of your Discord account data.
- On the Steam forums and on social media we read public content about our games to reply and to understand what players think.

7. Recipients of the data

Data may be processed by parties acting as our processors (Art. 28 GDPR) or as independent controllers:

Party	For what	Role
Valve Corporation (Steam)	Distribution, Steam sign-in, Steam Cloud, Marketplace, payments	Independent controller
Microsoft (PlayFab and Azure)	Lootborne servers, leaderboards and statistics	Processor
Exit Games GmbH (Photon)	Online matches and voice chat in Slowly Sliding Ducks	Processor
Unity Technologies (Unity Analytics)	Usage statistics and diagnostics	Processor
Google (Google Analytics)	Visit statistics for the tunnelvision.it and turbolentogames.com websites	Processor
Aruba S.p.A., Wix.com Ltd. and other e-mail and IT service providers	tunnelvision.it website, Slowly Sliding Ducks server and e-mail (Aruba); turbolentogames.com website (Wix); support mailboxes	Processors
Anthropic (Claude)	Assistants for support and moderation	Processor
Discord Inc.	The games' Discord servers	Independent controller
Apple, Google and the other stores	Distribution and payments	Independent controllers
Publishers and partners of individual titles: Team17 (Everplay), Toplitz Productions, Fantastico Studio	Publishing, co-production and porting, depending on the title	Independent controllers or processors, depending on the contract
Advisers, professionals and authorities	Legal obligations and protection of rights	Independent controllers

Data are not disclosed indiscriminately or sold to third parties.

8. Transfers outside the European Union

Some providers, including Valve, Microsoft, Google, Unity, Anthropic and Discord, are based in or process data in the United States. Transfers take place with the safeguards of Articles 44 et seq. GDPR: adequacy decisions of the European Commission, including the EU-US Data Privacy Framework for certified providers, or Standard Contractual Clauses. You can ask the Controller for a copy of the safeguards.

9. Your rights

Within the limits of the law, you have the right to:

- access your data and information about the processing (Art. 15);
- rectification of inaccurate or incomplete data (Art. 16);
- erasure of your data (Art. 17);
- restriction of processing (Art. 18);
- data portability (Art. 20);
- object to processing based on legitimate interest (Art. 21);
- not be subject to a decision based solely on automated processing, in the cases and with the safeguards of Art. 22 (section 12);
- withdraw consent at any time, without affecting earlier processing (Art. 7).

To exercise them, write to info@tunnelvision.it or to the certified e-mail tunnelvision@legalmail.it. Tell us the game and your Steam ID, which we need to find your data: we may ask you to show that the account is yours. We reply without undue delay and in any case within one month, subject to the extensions allowed by law.

If you ask us to delete your account in an online game, you lose the progress, leaderboard positions and items kept on our servers, including those obtained with in-game purchases. The save file on your PC and in Steam Cloud and the items in your Steam inventory stay with you and with Valve. Data we must keep by law, such as purchase records, are kept for the legal periods.

10. Minors

Our services are not intended for minors below the age required by applicable law to give valid consent to processing (in Italy, 14 years under Art. 8 GDPR and national law). We do not knowingly collect data from minors without the consent of the holder of parental responsibility. If you are a parent and believe your child has given us data, write to us: we will delete it.

11. Cookies and websites

The turbolentogames.com website uses technical cookies, needed for it to work, and, only if you accept it in the cookie banner, Google Analytics. The tunnelvision.it website also uses Google Analytics, Google's service for measuring visits: it sets the _ga and _ga_5TEQ7JC6S8 cookies, which last more than a year, and sends Google data about the visit, such as the pages viewed, the device and the IP address. The site does not currently ask for your consent to these cookies: you can block them in your browser settings. We do not use profiling cookies.

12. Automated decisions: the Lootborne anti-cheat system

Lootborne uses an anti-cheat system that automatically checks game data. When it detects certain violations, such as statistics or progress that cannot be achieved through normal play, it may reset the PvP ranking points, suspend or ban the account without human involvement. We do this to protect the fairness of the leaderboards, PvP and the Marketplace for all players, on the basis of the terms you accept by playing (Art. 22.2.a GDPR).

If your account is sanctioned, you see a notice at login with the address for appeals. By writing to feedback@turbolentogames.com you can express your point of view and contest the decision: the appeal is reviewed by a person at the Company, who can lift the sanction.

Apart from this case, the Controller does not take decisions based solely on automated processing that produce legal effects or similarly significant effects.

13. Data security

We take appropriate technical and organisational measures to protect data against unauthorised access, loss, destruction or disclosure (Art. 32 GDPR), including pseudonymous identifiers in statistics and access to data limited to those who need it. No system can guarantee absolute security.

14. Changes to this policy

We may update this policy to reflect legal, organisational or technological changes, for example when a new game is released. The updated version is published on the website with its date.

15. Complaints to the supervisory authority

Without prejudice to any other remedy, you may lodge a complaint with a supervisory authority: in Italy the Garante per la protezione dei dati personali (www.garanteprivacy.it), or the authority of the EU Member State where you live or work.

16. Contacts

Tunnel Vision S.r.l. (brands: Turbolento Games · turbolento publishing · Fate Rate)

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