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your contact details. 3.4 Your Use of the Steam Client and Websites We collect a variety of information through your general interaction with the websites, Content and Services offered by Steam. Personal Data we collect may include, but is not limited to, browser and device information, data collected through automated electronic interactions and cookies. Like most websites, we will track your previous access to our website and attempt to optimize our services. 3.5 Your Use of Our Website and Other Subscriptions In order to provide you with services, we need to collect, store and use various types of information about your activity in our Content and Services. "Content-Related Information" includes your Steam ID, as well as what is usually referred to as "game statistics". By game statistics we mean information about your games' preferences, progress in the games, playtime, as well as information about the device you are using, including what operating system you are using, device settings, unique device identifiers, and crash data. 3.6 Tracking Data and Cookies We use "Cookies", which are text files placed on your computer, and similar technologies (e.g. web beacons, pixels, ad tags and device identifiers) to help us analyze how users use our services, as well as to improve the services we are offering, to improve marketing, analytics or website functionality. The use of Cookies is standard on the internet. Although most web browsers automatically accept cookies, the decision of whether to accept or not is yours. You may adjust your browser settings to prevent the reception of cookies, or to provide notification whenever a cookie is sent to you. You may refuse the use of cookies by selecting the appropriate settings on your browser. The management of the use of cookies for each browser is further detailed on the following help page: . However, please note that if you do this, you may not be able to access the full functionality of our websites. When you visit any of our services, our servers log your IP address, which is a number that is automatically assigned to the network your computer is part of. 3.7 Content Recommendations We may process information collected under this section 3 so that content, products and services shown on the pages of the Steam store and in update messages displayed when launching the Steam Client can be tailored to meet your needs and populated with relevant recommendations. This processing is done in accordance with applicable law, and it is permitted under applicable laws on email marketing. Valve may send you marketing messages about products and services offered by Valve to your email address. In such a case we also may use your collected information to customize such marketing messages as well as collect information on whether you opened such messages and which links in their text you followed. You can opt out or withdraw your consent to receive marketing emails at any time by either withdrawing the consent on the same page where you previously provided it or clicking the "unsubscribe" link provided in every marketing email. 3.8 Information Required to Detect Violations We collect certain data that is required for our detection, investigation and prevention of fraud, cheating and other violations of the SSA and applicable laws ("Violations"). This data is used only for the purposes of detection, investigation, prevention and, where applicable, acting on of such Violations and stored only for the minimum amount of time needed for this purpose. If the data indicates that a Violation has occurred, we will further store the data for the establishment, exercise or defense of legal claims during the applicable statute of limitations or until a legal case related to it has been resolved. Please note that the specific data stored for this purpose may not be disclosed to you if the disclosure will compromise the mechanism through which we detect, investigate and prevent such Violations. 4. How Long We Store Data We will only store your information as long as necessary to fulfill the purposes for which the information is collected and processed or – where the applicable law provides for longer storage and retention period – for the storage and retention period required by law. We will delete your information once the storage period has expired. In particular, if you terminate your Steam Account, we will delete all information that you have entered in our systems, except for information that we require for legitimate purposes, such as longer storage periods. In such cases, your Personal Data cannot be completely deleted in order to ensure the consistency of the gameplay experience of the Steam community Market. For example, if you have made a trade, your connection to that trade will be permanently anonymous. Please note that Valve is required to retain certain transactional data under statutory commercial and tax law for a period of up to ten (10) years. If you withdraw your consent on which a processing of your Personal Data or of the Personal Data of your child is based, we will delete your Personal Data or respectively the Personal Data of your child without undue delay to the extent that the collection and processing of the Personal Data was based on the withdrawn consent. If you exercise a right to object to the processing of your Personal Data, we will review your objection and delete your Personal Data that we processed for the purpose to which you objected without undue delay, unless another legal basis for processing and retaining this data exists or unless applicable law requires us to retain the data. 5. Who Has Access to Data Valve does not sell Personal Data. However, we may share or provide access to each of the categories of Personal Data we collect as necessary for the following business purposes. 5.1 Valve and its subsidiaries may share your Personal Data with each other and with us to the degree necessary to achieve the purposes listed in section 2 above. In the event of a reorganization, sale or merger we may transfer Personal Data to the relevant third party subject to applicable laws. 5.2 We may also share your Personal Data with our third party service providers that provide customer support services in connection with our goods, Content and Services distributed via Steamworks API. Personal Data we share must be in accordance with this Privacy Policy and only as far as is necessary for performing customer support services. 5.3 In accordance with internet standards, we may also share certain information (including your IP address and the location of your computer) with our content providers and third-party providers in order to deliver content to you. Our content providers and third-party providers may use this information to target advertising to you. 5.4 Valve's digital rights management system uses digital rights management technology to protect the intellectual property of the publishers of the content delivered to you, based on your geographic location. 5.4 Google Analytics Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website operators analyze how visitors use the site. The information generated by the cookie about the visitors' use of the website will generally be transmitted to and stored by Google on servers in the United States. On this website, IP anonymization has been activated. The IP addresses of users visiting Steam will be shortened. Only in exceptional cases will a complete IP address be transferred to a Google server in the United States and shortened there. On behalf of the website operator, Google will use this information for the purpose of evaluating the website for its users, in order to compile reports on website activity, and to provide other services relating to website activity and internet usage for website operators. Google will not associate the IP address transferred in the context of Google Analytics with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that in this case you may not be able to use the full functionality of this website. You can learn more about how Google Analytics collects and uses data at www.google.com/policies/privacy/partners. Furthermore, you can prevent Google's collection and processing of data about your use of the website, by downloading and installing the browser plug-in through the following link: . 5.5 We make certain data related to your Steam User Account available to other players and our partners through the Steamworks API. This information can be used by them to enhance their own services and to respond to requests from their users. 5.6 Community Profile Information The Steam community profile page contains information that is publicly available on the Steam Community user profile page; data publicly available on your profile page can be accessed automatically through the Steamworks API. In addition to the publicly available information, game developers and publishers have access to certain information from the Steamworks API directly relating to the users of the games they operate. This information includes as a minimum your ownership of the game in question. Depending on which Steamworks services are implemented in the game it may also include leaderboard information, your progress in the game, achievements you have completed, your multiplayer game matchmaking information, in-game items and other information needed to operate the game and provide support for it. For more information on what Steamworks services a specific game has implemented, please review its store page. While we do not knowingly share Personally Identifying Information about you through the Steamworks API such as your real name or your email address, any information you share about yourself on your public Steam profile can be accessed through the Steamworks API, including information that may make you identifiable. 5.6 The Steam community includes message boards, forums and/or chat areas, where users can exchange ideas and communicate with each other. When posting a message to a board, forum or chat area, please be aware that the information is being made publicly available online; therefore, you are doing so at your own risk. If your Personal Data is posted on one of our community forums against your will, please use the reporting function and the Steam help site to request its removal. 5.7 Valve may allow you to link your Steam User Account to an account offered by a third party. If you do this, you agree to release Valve from liability for any actions taken by the third party. If you wish to unlink your Steam User Account from a third party account, please go to the account linking page. 5.8 If you wish to be informed about it before the linking takes place and you will be given the opportunity to consent to the linking and the transmission of your information. The third party's use of your information will be subject to the third party's privacy policy, which we encourage you to review. 5.8 Valve may release Personal Data to comply with court orders or laws and regulations that require us to disclose such information. 6. Your Rights and Control Mechanisms The data protection laws of the European Economic Area, California, and other territories grant their residents certain rights in relation to their personal data. While other jurisdictions may provide fewer statutory rights, we make the tools designed to exercise such rights available to our customers worldwide. To allow you to exercise your data protection rights in a simple way we are providing a dedicated section on the Steam support page (the "Privacy Dashboard"). This gives you access to your Personal Data, allows you to rectify and delete it where necessary and to object to its use where you feel necessary. To access it, log into the Steam support page at and choose the menu items My Account -> Data Related to Your Steam Account. In most cases, you can access, manage, or delete Personal Data in the Privacy Dashboard, but you may also contact Valve with questions or requests via the contact processes described in sections 8 and 10 below. As a resident of the European Economic Area you have the following rights in relation to your Personal Data: 6.1 Right of Access. You have the right to access your Personal Data that we hold about you, i.e. the right to require free of charge (i) information whether your Personal Data is retained, (ii) access to and/or (iii) deletion of your Personal Data, (iii) correction of inaccuracies, (iv) restriction of processing, (v) portability of your Personal Data, (vi) deletion of your Personal Data, (vii) objection to the processing of your Personal Data, (viii) withdrawal of your consent, (ix) communication or taking the action requested) or refuse to act on the request. 6.2 Right to Rectification. If we process your Personal Data, we shall endeavor to ensure by implementing suitable measures that your Personal Data is accurate and up-to-date for the purposes for which it was collected. If your Personal Data is inaccurate or incomplete, you can change the information you provided via the Privacy Dashboard. 6.3 Right to Erasure. You have the right to obtain deletion of Personal Data concerning you if the reason why we could collect it (see section 2. above) does not exist anymore or if there is another legal ground for its deletion. For individual items of Personal Data please edit them through the Privacy Dashboard or request the deletion via the Steam support page. You can also request the deletion of your Steam user account via the Steam support page. As a result of deleting your Steam User Account, you will lose access to Steam services, including the Steam User Account. Subscriptions and game-related information linked to the Steam User Account and the possibility to access other services you are using the Steam User Account for. We allow you to restore your Steam User Account during a grace period of 30 (thirty) days from the moment you request deletion of your Steam User Account. This functionality allows you not to lose your account by mistake, because of your loss of your account credentials or due to hacking. During the suspension period, we will be able to finalize financial and other activities that you may have initiated before sending the Steam User Account deletion request. After the grace period, Personal Data associated with your account will not be deleted subject to section 4. above. In some cases, we may be unable to delete your Personal Data immediately. 6.4 Right to Object. When our processing of your Personal Data is based on legitimate interests according to Article 6(1)(f) of the GDPR / section 2(c) of this Privacy Policy, you have the right to object to this processing. If you object we will no longer process your Personal Data unless there are compelling and prevailing legitimate grounds for the processing as described in Article 21 of the GDPR, in particular if the data is necessary for the establishment, exercise or defense of legal claims. You also have the right to lodge a complaint at a supervisory authority. 6.5 Right to restriction of processing of your Personal Data You have the right to obtain restriction of processing of your Personal Data under the conditions set out in article 18 of the GDPR. 6.6 Right to Personal Data portability You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller under the conditions set out in article 20 of the GDPR. Valve makes your Personal Data available in structured HTML format through the Privacy Dashboard as described above. 6.7 Right to Post-Mortem Control of Your Personal Data If French data protection legislation is applicable to you, you have the right to establish guidelines for the preservation, the deletion and the transmission of Personal Data after your death in accordance with article 40-1 of the Act No 78-17 of 6 January 1978 on Information, Technology, Data Files and Civil Liberties. 7. Children The minimum age to create a Steam Account is 13 years old. If you are under 18 years old, you need parental approval to create a Steam Account. Parents or guardians should monitor their children's use of the Internet and take steps to ensure that they do not disclose personal information to others. We encourage parents to instruct their children to never give out personal information when online. 8. Contact Info You can contact Valve's data protection officer at the address below. While we review any request sent by mail, please be aware that to combat fraud, harassment and identity theft, the only way to access, rectify or delete your data is through logging in with your Steam User Account at and selecting the menu items -> My Account -> View Account Data. Valve Corporation Attn: Data Protection Officer P.O. Box 1688 Bellevue, WA 98009 European representative for data protection questions: Valve GmbH Attn: Legal Rüdigersmarkt 9 D-20459 Hamburg Germany 9. Additional Information for Users from the European Economic Area, U.K., and Switzerland Although the EU-U.S. Privacy Shield and the Swiss-US Privacy Shield have been ruled invalid as a legal basis for data transfers to the U.S., Valve and TR Technical Services Inc., its wholly-owned U.S. subsidiary (collectively "Valve") continue to comply with the Privacy Shield Principles with respect to any Personal Data transferred from the EU, UK, and Switzerland to the United States in reliance on the Privacy Shield. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit . The Federal Trade Commission has jurisdiction over Valve's compliance with the Privacy Shield Principles. Under the Principles, Valve shall remain liable if third party agents process the personal information on our behalf in a manner inconsistent with the Principles, unless Valve proves it is not responsible for the event giving rise to the damage. EU, UK and Switzerland authorities may inquire about our compliance regarding our Privacy Shield participation. If you are dissatisfied with our response to your request, you may file a complaint with the competent supervisory authority in your country. If you are located in California, the CCPA grants California residents certain privacy rights regarding the Personal Data we collect. We are committed to respecting these rights and complying with the CCPA. The following explains these rights and Valve's practices with respect to them. Right to Know. Under the CCPA you have the right to request that we disclose to you what Personal Data we collect, use, disclose, and sell. Right to Request Deletion. You also have the right to request deletion of Personal Data that is in our possession, subject to certain exceptions. Please note that your request to delete data may impact your use of the Steam service in some cases, and we may decline to delete information for reasons set forth in this Privacy Policy or as permitted by the CCPA. Other Rights. The CCPA also gives California residents a right to opt-out from the sale of their Personal Data. As described in section 5, we do not sell Personal Data and have not done so in the past 12 months. You also have a right to receive notice of our practices at or before collection of your Personal Data. Finally, you have a right to not be discriminated against for exercising your rights under the CCPA. Exercising Your Rights. The primary means of accessing, managing or deleting your Personal Data through the Privacy Dashboard, as described in section 6 of this Privacy Policy. Customers may also delete their Steam Account and associated Personal Data as described in section 6.3 of this Privacy Policy. If you are unable to access or delete data through the Privacy Dashboard, you can also contact us with a request to exercise these rights by using the form found at . To verify your identity, we will ask you to confirm your account information with us. You may designate, in writing, an authorized agent to act on your behalf, and we may need you to verify your identity directly with us. Categories, Sources, Purposes, and Recipients of the Data We Collect. Over the preceding 12 months, we have collected the categories of Personal Data described in section 3 of this Privacy Policy. The sources from which we collect Personal Data, and the purposes for which we collect and process it, are described in sections 2 and 3. Over the preceding 12 months, we have disclosed for business purposes each of the categories of Personal Data with the categories of third parties as described in section 5. Revision Date: January 8, 2021 Page 10 B

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