

WIZARDS PLAY NETWORK PRIVACY POLICY

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[Download a PDF copy of the Wizards Play Network Privacy Policy](#)

1. Introduction

The Wizards Play Network ("WPN") is a promotional program operated by Wizards of the Coast LLC ("Wizards," "we," "our," or "us") that allows stores to connect with customers and access exclusive events and materials by hosting organized gaming events. This privacy policy ("Privacy Policy") explains how we collect, use, store and disclose information about you when you enroll and participate in the WPN. This Privacy Policy applies to information we collect when you enroll in the WPN, use our website, use the Wizards Event Reporter ("WER") reporting tool and other services that link to this Privacy Policy (collectively, the "Service"). This Privacy Policy does not apply to our information collection activities outside of the Service (unless otherwise stated below or at the time of collection).

By using the Service, you agree to our [Wizards Play Network Terms and Conditions](#) and consent to our processing of information as described in this Privacy Policy. If you do not agree and consent, please do not use the Service.

2. ESRB Privacy Certified

The ESRB certification seals shown on our Service confirm that Wizards is a valid licensee, and participating member, of the [Entertainment Software Rating Board's Privacy Certified Program](#) ("ESRB Privacy Certified"). To help protect your privacy, we have voluntarily undertaken this privacy initiative and have had all areas of our Service where this Privacy Policy is posted reviewed and certified by ESRB Privacy Certified to meet established online information collection, use, and disclosure practices. As a licensee of this program, we are subject to audits of our Service and other enforcement and accountability mechanisms administered independently by the ESRB.

3. Information Collection

A. Information You Provide

Wizards collects information you provide directly via the Service. The data we collect may include data that identifies you personally (whether alone or in combination). Some examples of data we collect include the following:

- **Name and Business Contact Data.** We collect your first and last name, business email address, business postal address, business telephone number, and other similar business contact data. We also collect the names and email addresses of persons approved to purchase on behalf of your store as well as the names of principals and officers of your store.
- **Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.
- **Payment and Tax Data.** We collect data necessary to process your payments through the Service, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. We also collect your business license or Tax ID, a federal tax identification number or applicable tax identification information or equivalent information within your region, and other information for tax purposes.

- **Business Information.** We collect the website URL for your business, pictures and videos of your store, your years in business, your business lease and utility bills, and other information about your business.
- **Partner, Distributors, and Vendor Information.** We collect information about your partners, distributors, and vendors, including copies of your applicable agreements.
- **Events and Player Data.** We collect data about the events you host, the benefits you earn, and the tournament organizers you use. We also collect data about the players that participate in your events or visit your store.
- **Content.** We collect the content of messages you send to us, such as feedback, questions, and information you provide for customer support.

To the extent you provide us with any personal data during or in connection with your use of the Service, you agree to comply with Section 12 (Data Processing) of our [Wizards Play Network Terms and Conditions](#).

Wizards collects data from you at various points on the Service, including as described below:

- **Wizards Play Network Accounts.** To register a WPN account with Wizards, you must, at a minimum, provide your name and business contact data and credentials. You may also need to provide your payment and tax data, business information, partner, distributors, and vendor information, and other information required to set up and maintain your WPN account and use the WER.
- **Events.** When you organize an event or tournament, you will be required to provide us with certain information relating to the event, including event and player data.
- **Customer Service.** When you contact customer service you may be asked to provide us with information such as your name, telephone number, address and email. We collect this information as part of our customer service efforts and it is used to confirm your identity, respond to your inquiries or comments, for training purposes, and to assist us in providing better products and services.
- **Online Surveys.** In order to improve the user experience at our Service, we may employ online surveys for you to volunteer information and provide us feedback about our Service and what we can do to make it better.

You may choose to voluntarily submit other information to us through the Service that we do not request, and, in such instances, you are solely responsible for such information.

B. Information Collected Automatically

We automatically collect information about your device and how your device interacts with our Service. For example, we collect:

- **Service Use Data.** We collect data about the features you use, the time of day you browse, and the web pages you visit.
- **Device, Connectivity, and Configuration Data.** We collect data about the type of device or browser you use, your device's operating software, your regional and language settings, and other similar information. This also includes IP address, MAC address, mobile Ad Ids (e.g., IDFA or AAID), and other device identifiers.
- **Location Data.** We collect data about your location, which can be precise or imprecise. Precise location data can be Global Navigation Satellite System (GNSS) data (e.g., GPS), as well as data identifying nearby cell

towers and Wi-Fi hotspots. We collect precise location data when you enable location-based products or features. Imprecise location data includes, for example, a location derived from your IP address or data that indicates where you are located with less precision, such as at a city or postal code level.

We use various current – and later – developed technologies to collect this data (“Tracking Technologies”), including the following:

- **Log Files.** Some data collected by Wizards is in the form of log-files that record website activity and gather statistics about web users' browsing habits. These entries help Wizards determine (among other things) how many and how often users have visited our Service, which pages they've visited, and other similar data. We also use the log file entries for our internal marketing and demographic studies, so we can constantly improve the online services we provide you.
- **Cookies.** Cookies are pieces of information placed on your device when you visit a website that act as a unique tag to identify your browser. We use "cookies" to enhance your experience at our Service and to help us understand how you interact with our Service. For example, a cookie may allow us to remember certain things based on your IP address, such as the time and duration of your visits, how you navigated through our content, and where you exited a particular site. To learn more about how we use cookies, please visit our **WPN Cookie Policy**.
- **Clear GIFs.** Clear GIFs, sometimes called "web bugs," "pixel tags," or "web beacons" are file objects, usually a graphic image such as a transparent one pixel-by-one pixel GIF, that are placed on a web page, advertisement, or in an email message. The GIF may tell us the IP address of the device that fetched our page, the URL of the page the GIF is on, the time the page was viewed, the type of browser used, and it can also identify a previously set cookie value, and how and where a user accessed a website. We may use this information to count visitors across our Service and understand how they navigate and use our Service.
- **Location-Identifying Technologies.** GPS, WiFi, Bluetooth, and other location-aware technologies may be used to determine your device's location, sometimes precisely. Location data may be used for purposes such as verifying your device's location and delivering or restricting relevant content and advertising based on that location.
- **App-Specific Technologies.** Our apps may include app-specific technologies, such as SDKs and APIs provided by third parties. An SDK is code embedded in an app that sends information about your use to a server, and is in effect the app version of a GIF. The information collected through such technologies often includes your mobile Ad Id.

We use third party analytics providers, such as Google Analytics, to use Tracking Technologies on our Service to help us analyze your use of the Service, compile statistic reports on the Service's activity, and provide other services relating to Service activity and internet usage. We also work with ad serving services, advertisers, and other third parties to serve advertisements on the Service and/or on Third Party Services (defined below). These third parties may use Tracking Technologies on our Service and Third Party Services to track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you on the Service and Third Party Services or third party devices after you have left the Service (“Interest-based Advertising”).

For further information on Tracking Technologies and your rights and choices regarding them, please see the sections entitled **Third Party Services, Features, and Devices** and **Your Rights and Choices** below.

C. Information from Other Sources

We also obtain information about you from other third party sources. To the extent we combine such third party sourced information with information we have collected about you through the Service, we will treat the combined information in accordance with this Privacy Policy, plus any additional restrictions imposed by the source of the data. These third party sources vary over time, but may include:

- Social network profiles tied to your store or posts that reference the Service.
- Partners or third parties with which we offer co-branded services, sell or distribute our products, engage in joint marketing activities, or are involved in events or tournaments.
- Publicly-available sources such as open government databases or other data in the public domain, including the Department of Licensing, the Secretary of State, and Google (images and street view).

For further information on Third Party Services, see the section entitled **Third Party Services, Features, and Devices** below.

4. Information Use

Wizards uses information about you, including personal data, for our legitimate interests, including the following purposes:

- To enroll you into the WPN and maintain your account.
- To verify your store is registered as a business and that it meets certain requirements.
- To operate, manage, and provide you with our Service, including to process your transactions.
- To perform services requested by you, such as to respond to your comments, questions, and requests, and provide customer service.
- To send you technical notices, updates, security alerts, information regarding changes to our policies, and support and administrative messages.
- To prevent and address fraud, breach of policies or terms, and threats or harm.
- To monitor and analyze trends, usage, and activities.
- For our internal research and demographic studies, so we can constantly improve the Service or other Wizards websites, applications, marketing efforts, products and services.
- To personalize the Service for you and develop and display advertising to you.
- To send you direct marketing communications including information about new products, contests, features and enhancements, special offers and other events of interest.

We also use information about you, including personal data, with your consent, including:

- To provide you with advertisements on our Service and other Third Party Services tailored to your interests.
- Verify your eligibility and deliver prizes in connection with contests, sweepstakes, and promotions you have entered.
- To fulfill any other purpose disclosed to you and with your consent.

We may use information that does not identify you (including information that has been de-identified) without obligation to you except as prohibited by applicable law. For information on your rights and choices regarding how we use your information, please see the section entitled **Your Rights and Choices** below.

5. Sharing of Information

Wizards shares information about you as follows:

- **Service Providers.** Wizards may share your information, including personal data, with our agents, vendors, consultants, and other third party service providers (“Service Providers”) for purposes of processing your

information in connection with their work on our behalf. Service Providers assist us with operating our Service and provide us with other services such as organized play, events, community operations, transactions, prize payments, email services, marketing and promotional services, and technical support. Also, your credit card data may be processed by a payment processing Service Provider as necessary to process your payments (for example, to process your credit card). These Service Providers are contractually prohibited from using your information for any purpose other than to provide this assistance, and they agree to maintain the confidentiality, security and integrity of information they receive from us. We may, however, permit Service Providers to use aggregate information that does not identify you or de-identified information for other purposes.

- **Affiliates.** Wizards may share your information, including personal data, with Wizards' related entities including its parent and sister companies. For example, we may share your information with our affiliates for customer support, marketing, or technical operations.
- **Partners.** We may share your information, including personal data, with our partners in connection with offering you co-branded services, selling or distributing our products, or engaging in joint marketing activities.
- **Third parties.** We may share your information, including personal data, with third parties for purposes of providing you with advertisements, including those tailored to your interests.
- **Tournament and Organized Play.** We share information about you with other members of the WPN community and other members of the public. For example, when you join the WPN, your business information and information about the events you host will be published on our website and event locator service and may be accessible to members of the WPN and other members of the public through other current or future digital services or mobile applications. We also share information about you with tournament organizers and the judge community.
- **Promotions.** Our promotions may be jointly sponsored or offered by third parties. If you voluntarily choose to enter a promotion, your information, including personal data, may be disclosed to third parties for administrative purposes and as required by law (e.g., on a winners list). By entering, you agree to the official rules that govern that promotion, and may, except where prohibited by applicable law, allow the sponsor and/or other parties to use your name, voice, likeness, and/or store information in advertising or marketing materials.
- **Merger or Acquisition.** In the event of, or during negotiations of, an actual or proposed merger, acquisition, reorganization, bankruptcy, or other similar event, your information, including personal data, may be shared with Wizards' successors or assigns or other third parties involved in the event.
- **Security and Compelled Disclosure.** We may disclose your information, including personal data, to comply with law or other legal process, and where required, in response to requests by public authorities, including to meet national security or law enforcement requests. We may also share your information in connection with an investigation of fraud, harassment, intellectual property infringements, or other activity that is illegal, a violation of our policies, or may expose you or us to legal liability. We may also share your information to protect the rights, property, life, health, security and safety of us, the Service or any third party.
- **Consent.** We may share your information, including personal data, for any other purpose disclosed to you and with your consent.

Without limiting the foregoing, in our sole discretion, we may share aggregated information which does not identify you or de-identified information about you with third parties or affiliates for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we share your information, please see the section entitled **Your Rights and Choices** below.

6. Children’s Information

We do not knowingly collect information from children without express parental consent. We become aware that we have inadvertently received information from a child, we will delete such information from our records. Because we do not collect information from children without express parental consent, we also do not knowingly distribute such information to third parties. If you submit any information to us from children (such as from players in connection with your events), you are fully responsible for obtaining the requisite consent for you and us to be able to use the information under this Privacy Policy and in accordance with applicable law, including the verifiable parental consent requirements under the U.S. Children’s Privacy Protection Rule (“COPPA”).

7. Third Party Services, Features, and Devices

Our Service contains content from and hyperlinks to websites, locations, platforms, and services operated, owned, and maintained by third parties (“Third Party Services”). These Third Party Services may use Tracking Technologies to independently collect information about you and may solicit information from you.

We may allow you to access our Service through a Third Party Service or connect our Service to a Third Party Service (“Third Party Features”). If you use a Third Party Feature, both we and the applicable third party may have access to and use information associated with your use of the Third Party Feature. For example, you can “like” or engage with our content on or through third party social networking services, such as Facebook and Twitter. When you engage with our content (such as through our brand page or via our chatbot on Facebook Messenger), you may allow us to have access to certain information from your social media profile, such as your name, email address, photo, gender, birthday, location, your list of friends, people you follow and/or who follow you, the posts or the “likes” you make. We may also obtain other information such as content viewed and information about advertisements within the content you have been shown or may have clicked on from your interaction with our content. When you provide information from your social media account, it can help enable us to do things like (1) give you exclusive content, (2) personalize your online experience with us within and outside our Service, and (3) contact you through the social networking service or directly by sending you the latest news, special offerings, and rewards. If you post information on social media that references our Service (e.g., by using a hashtag associated with Wizards in a tweet or status update), your post may be used on or in connection with our Service. Through some social networking services’ privacy settings, you can control what data you share. For more information about how social networking services handle your information, please refer to their respective privacy policies and terms of use.

In addition, we may serve ads on Third Party Services, such as Facebook and Google, that are targeted to reach people (or similar people) on those services that have visited our Service or that are also identified in one or more of our databases (“Matched Ads”). This is done by matching common factors between our data and the data of Third Party Services. If we use Facebook Custom Audiences to serve Matched Ads on Facebook services, you should be able to hover over the box in the right corner of such a Facebook ad and find out how to opt-out. We are not responsible for such Third Party Services’ failure to comply with your opt-out instructions.

The information collected and stored by third parties, whether through our Service, a Third Party Service, a Third Party Feature, or a third party device, remains subject to their own policies and practices, including what information they share with us, your choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage our users to read third party privacy policies before submitting any information to such third parties.

For further information on Tracking Technologies and your rights and choices regarding them, please see the sections entitled **Information Collected Automatically** above and **Your Rights and Choices** below.

8. Your Rights and Choices

A. Review and Updating Account Information

You may at any time review or update your business information and event information in your account through your account settings or by contacting us as set forth in the section entitled **Contact Us** below. We may require additional information from you to allow us to confirm your identity. If you wish to cancel your WPN Membership, please contact Retail Support as set forth in the section entitled **Contact Us** below. Please note that we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Data subjects in Europe have additional rights set forth in the section entitled **Your European Privacy Rights** below.

B. Tracking Technology Choices

- **Cookies and GIFs.** Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.
- **App-Specific Technologies.** You can reset your mobile Ad ID at any time through your device settings, which will allow you to limit the use of information collected about you. For information on how to do this on Apple devices, visit Apple.com or <https://support.apple.com/en-us/HT202074>. For information on how to do this on Android devices, visit Google.com. You can stop all collection of information via an app by uninstalling the app.
- **Location-Identifying Technologies.** The location data collected through an app depends on your device settings and app permissions. You can exercise choice over the location data collected through our apps by (i) for GPS data, disabling location in your device settings or disabling location permissions to that app; (ii) for Bluetooth data, disabling Bluetooth and any Bluetooth scanning option in your device settings; or (iii) for WiFi data, disabling WiFi and any WiFi scanning option in your device settings. You can stop collection of all location data via an app by uninstalling the app.
- **Do Not Track.** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, we do not monitor or take action with respect to “Do Not Track” signals or other mechanisms. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

Please be aware that if you disable or remove Tracking Technologies some parts of the Service may not function correctly.

C. Analytics and Interest-Based Advertising

You may exercise choice regarding the use of cookies from Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on.

Some of the third parties that collect information from or about you on the Service in order to provide more relevant advertising to you participate in the Digital Advertising Alliance (“DAA”) Self-Regulatory Program for Online Behavioral Advertising. This program offers a centralized location where users can make choices about the use of their information for online behavioral advertising. To learn more about the DAA and your opt-out options for their

members, please visit (i) for website opt-out, <http://www.aboutads.info/choices>; and (ii) for mobile app opt-out, <http://www.aboutads.info/appchoices>. In addition, some of these third parties may be members of the Network Advertising Initiative ("NAI"). To learn more about the NAI and your opt-out options for their members, please visit <http://www.networkadvertising.org/choices/>. Please note that if you opt-out of online behavioral advertising using any of these methods, the opt-out will only apply to the specific browser or device from which you opt out. Further, opting-out only means that the selected members should no longer deliver certain Interest-based Advertising to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). We are not responsible for effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs.

You may also limit our use of information collected from or about your mobile device for purposes of serving online behavioral advertising to you by going to your device settings and selecting "Limit Ad Tracking" (for iOS devices) or "Opt out of Interest-Based Ads" (for Android devices).

D. Communications

If you do not want Wizards to send you promotional emails about products, services or events, you may opt-out of receiving such promotional emails at the time of registration. After registration, you may opt-out by following the link provided in a Wizards email or by contacting us as set forth in the section entitled **Contact Us** below. Notwithstanding the foregoing, Wizards reserves the right to contact you with updates relating to your account, transactions, the Wizard Play Network Terms and Conditions. Please note that your opt-out is limited to the email address used and will not affect subsequent subscriptions.

E. Your California Privacy Rights

California Civil Code Section 1798.83 ("Shine the Light") permits customers of Wizards who are California residents to request certain information regarding its disclosure of personal information as defined by Shine the Light to third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes.

We share our customer's personal information as defined by Shine the Light with third parties and/or affiliates for such third parties' and affiliates' own direct marketing purposes. If you are a California resident and wish to obtain information about our compliance with this law, please contact us as set forth in **Contact Us** below. Requests must be in writing, include "California Privacy Rights Request" in the first line of the description, and include your name, street address, city, state, and ZIP code. Please note that Wizards is not required to respond to requests made by means other than through the provided email address or mail address.

F. Your European Privacy Rights

If you are a data subject in Europe, you have the right to access, rectify, or erase any personal data we have collected about you through the Service. You also have the right to data portability, right to be forgotten, and the right to restrict or object to our processing of personal data we have collected about you through the Service. In addition, you have the right to ask us not to process your personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by you. You may withdraw your consent at any time for any data processing we do based on consent you have provided to us.

To exercise any of these rights, contact us as set forth in the section entitled **Contact Us** below and specify which right you intend to exercise. We will respond to your request within 30 days. Further, if we are processing your information on behalf of a business customer, we will refer you to that business, and will support them to the extent required by applicable law in responding to your request. We may require additional information from you to allow us to confirm your identity. Please note that we store information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use the information even after a data subject request for purposes of our

legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

If you have any issues with our compliance, you have the right to lodge a complaint with a European supervisory authority.

9. Data Security

Wizards takes reasonable steps to help protect the security and integrity of any information you provide to us by implementing and maintaining administrative, physical, and technical safeguards. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information collected through our Service.

10. International Transfer of Information

Wizards is based in the U.S. and the information it collects is governed by U.S. law. If you are accessing the Service from outside the U.S., please be aware that information collected through the Service may be transferred across borders, and from your country or jurisdiction to other countries or jurisdictions around the world, including the U.S. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. By using the Service, you are expressly consenting to the transfer to and from, processing, usage, sharing, and storage of your information, including personal data, in the U.S. as well as other jurisdictions where Wizards conducts business or provides services. If your data is collected in the European Union or Switzerland, we will transfer your personal data subject to this privacy policy..

11. Changes to this Privacy Policy

We reserve the right to change this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Please visit this page from time to time to check for changes. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your email address.

12. Data Controller

EU data protection law makes a distinction between organizations that process personal data for their own purposes (known as “controllers”) and organizations that process personal data on behalf of other organizations (known as “processors”). Wizards may act as either a controller or a processor in respect to personal data submitted through the Service, depending on the circumstances.

Wizards, located at the address in the section entitled “Contact Us” below, is a controller with respect to information provided through the Service. However, in some instances, Wizards is as a processor for businesses in connection with their use of the Service. For example, Wizards provides the WER on behalf of businesses in order to help facilitate their events and tournaments. In such instances, the business is the controller, and users and player should visit the applicable business’s privacy policy for information about their privacy practices. Any questions relating to such personal data and rights under data protection law should therefore be directed to the business as the controller, not to Wizards.

13. Contact Us

If you have any comments, questions, or complaints regarding this Privacy Policy, our privacy practices, or our compliance with European regulation, please contact us using any of the following methods:

By mail:

Wizards of the Coast
ATTN: Retail Support
P.O. Box 707
Renton, WA 98057-0707

By phone:

US/Canada: (800) 564-1636

Other countries: (425) 204-8069

Note: We are available Monday through Friday, from 9:00 am to 5:00 pm Pacific Time, and also on weekends from 10:00 am to 4:00 pm Pacific Time.

Online form:

Submit a help request at <http://wpn.wizards.com/en/contact-us> (requires creating an account or signing in to your account).

ESRB:

For complaints, you can also contact ESRB Privacy at ESRB Attn: Privacy Certified Program, 420 Lexington Avenue, Suite 2240 New York, New York 10170, by email at privacy@esrb.org, or directly through their [consumer hotline](#).

European Requests:

For Europe specific requests, you can reach our DPO at: dpo@hasbro.com