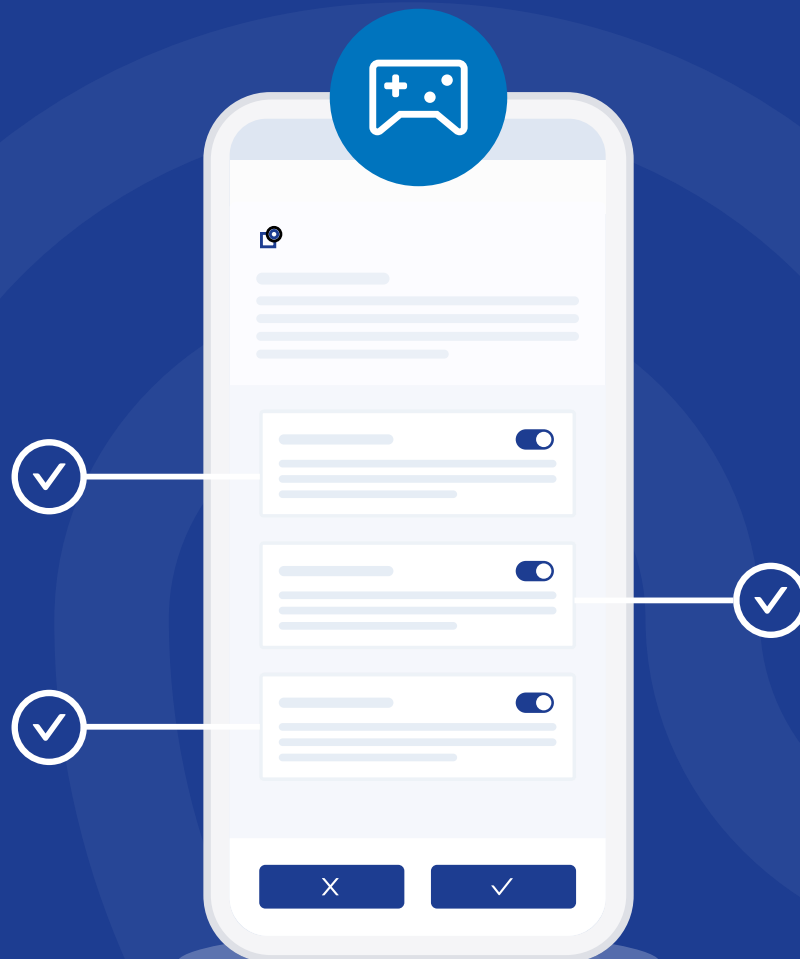


GDPR Checklist for Mobile Games



DISCLAIMER

These statements do not constitute legal advice. They merely serve to support and inform you about the current legal situation. Please consult a qualified lawyer should you have any legal questions.

Following these steps will help ensure that your mobile game is compliant with the GDPR and ePrivacy Directive. This will protect your company from fines and your users' data from misuse. Tick the boxes to see how compliant you are or need to be.

1

Conduct an audit of your mobile game

- Identify all SDKs installed in your games
- Document the scope of each third-party technology: what data they access (i.e. AAID, IDFA, IP address, etc.) and why
- Make sure third-party technologies can receive and apply user consent choice (i.e. can they receive and apply GDPR consent?)
- Avoid access to persistent identifiers (e.g. IMEI and device number)
- Limit your mobile games permissions request only to the essentials to run your service

2

Explain what the tracking technologies are doing and why in a comprehensive privacy policy

- Inform users about what data are collected, how and why in the **privacy policy**
- Check relevant data protection laws for further details
- Ensure the privacy policy is updated and is easy to find, read and understand for the average user

3

Let users know you are using tracking technologies (e.g. SDKs) via a consent banner

- Show a consent banner** before any SDK starts collecting data
- Ensure that you inform users and **receive valid consent** (check #4), especially for non-essential technologies (e.g. marketing, monetization, mediation, attribution)
- Collect consent again every time technologies in use change
- Inform users** about the purpose of each SDK separately in the consent banner

4

Obtain valid user consent per the GDPR

In order for consent to be valid it has to be:

- Explicit:** active acceptance, e.g. ticking a box or clicking a link
- Informed:** what, why, by whom, for how long
- Documented:** ensure you can provide proof of consent in the case of an audit (also check #7)
- In advance:** no data can be collected before opt in, e.g. SDKs cannot “fire” before the user’s consent has been passed to them
- Granular:** individual consent options for each purpose must be offered - consent cannot be bundled to cover other purposes or activities
- Freely given:** “Accept” and “Reject” options, e.g. button or link
- Easy to withdraw:** easy access to change consent preferences in the future (also check #8)

5

Enable users to access your service even if they do not consent to tracking technologies

- If a user refuses data processing, **no non-essential tracking can collect data**, essential tracking technologies needed for the game to function can keep operating
- Ensure users can still **access your game** even if they refuse the use of tracking technologies, blocking them can be a discriminatory action

6

Collect and process data only after obtaining valid consent

- Ensure that SDKs are not loaded until the user has given consent
- Once you have obtained valid consent, **you can collect and process personal data** (e.g. AdID, IDFA) for the purposes that users have been informed about

7

Document and store consent received from users

- Comply with your documentation obligation and ensure you are able to verify users' consent in case of an **audit by data protection authorities (DPA)**

8

Opt out must be as simple as opt in

- Make it as easy for users to withdraw their consent as it was to give it in the first place - **easy in, easy out**
- External links** to a third page for opt out are not sufficient
- Make sure that the **options for acceptance and rejection are comparably designed**, e.g. on the same level, in the same format, with the same degree of simplicity

9

After opt out ensure that no further data is collected or forwarded

- Ensure that **from the moment of rejection** on, no further data is collected or forwarded

Usercentrics Consent Management Platform can help you simplify the privacy compliance complexity for your mobile games. **Schedule a demo today.**

Write us at: apps@usercentrics.com

Get in touch with us