

## Privacy policy

We create and publish free mobile games and applications that aim to entertain, inform and connect people by leveraging global creative power.

The purpose of this policy is to provide you with all the important information and explanations about how and why some of your data may be collected and processed by us when you use one of our applications. This privacy policy governs and details the main principles that we apply to the data we collect and process to:

(i) develop and publish mobile apps("Apps and games"),

(ii) serve advertising that are tailored to the interests of users ("The Ads").

This policy also aims to remind you about your rights and to provide you with all the elements you need to exercise them.

Should you have any questions related to this policy or our practices around privacy and data protection in general, please don't hesitate to contact our developer team via the developer email on the application page.

## Apps and games

Why do we collect data from our apps and games?

When you install and use our mobile applications, we can collect and process some of your data for different legitimate purposes.

You will find below explanations regarding the reasons why we may collect data and the legal bases we rely on in each case.

Collects data:

To provide you with the services you asked for

(e.g., knowing that you completed the first level to allow access to the second one)

Legal basis – such data processing is strictly necessary for the service(s) asked

To run analytics and understand how users interact with our product and services in order to continuously improve it

(e.g. identifying that a feature is annoying for users or that a level is too difficult for most gamers)

Legal basis - Express consent. We only process or share personal data collected through our apps for analytics purposes once you express your consent through the pop-up notice included in our apps.

To serve advertising tailored to the preference and interests of our users

and allow us to continue to provide free services and products

Legal basis – Express consent. We only processes or shares personal data collected through our apps for personalized advertising purposes once you express your consent through the pop-up notice included in one of our apps.

For all data processing activities that rely on users' consent, you can withdraw your consent at any time from the "settings" page in our various applications.

Please only note that in the case where you withdraw your consent or where you refuse to consent in the first place, you will still be served with advertising but that may be less relevant to you as it will not be tailored to your interests.

What data do we collect from its apps and games?

For all the purposes listed above the data that we collect is limited to:

The apps you are using

Your IP address

Your Mobile Advertising ID (Apple IDFA or Google AAID - which are technical identifiers developed by mobile operating systems for advertising purposes which remain under your control and can be reset or erased at any time in through your device settings)

Technical information about the device you use and your connection (user agent, type of connection, timestamp)

Data pertaining to your activities on our applications and notably the way in which you interact with our applications (for instance, how and when you use our applications) and with the advertising served in our applications (for instance, number of ads served, potential clicks)

With who may your data be shared & why?

We do not share your personal data with third parties without your prior consent.

When you consent to the collection of data for advertising and analytics purpose, we may share the data listed above with the following categories of recipients:

Ad Partners: that allow us to monetize the ad inventory of our apps and provide users with free products and services.

Those partners usually collect data via their own tools (Software Development Kits or “SDK”). You will find a list of our partners implementing advertising SDKs through our applications and the privacy policies of their services that describe their practices and allow you to exercise your rights directly toward them hereafter:

Adcolony -

<https://www.adcolony.com/privacy-policy/>

Applovin -

<https://www.applovin.com/privacy/>

Facebook -

<https://www.facebook.com/about/privacy>

Fyber -

<https://www.fyber.com/privacy-policy/>

Google -

<https://policies.google.com/privacy>

Inmobi -

<https://www.inmobi.com/privacy-policy/>

Ironsource -

<https://developers.ironsrc.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>

Mintegral -

<https://www.mintegral.com/en/privacy/>

Mopub -

<https://www.mopub.com/legal/privacy/>

Oath -

<https://policies.oath.com/in/en/oath/privacy/>

Ogury -

<https://ogury.com/privacy-policy/>



Tapjoy -

<https://www.tapjoy.com/legal/tapjoy-users/#privacy-policy>

Vungle -

<https://vungle.com/privacy/>

Analytic companies: that provide us with tools and technologies that allow us to better understand how users interact with our services and will help us improve it. Those partners also usually collect data via their own SDKs. You will find a list of our partners implementing analytical SDKs through our applications hereafter:

AppsFlyer -

<https://www.appsflyer.com/privacy-policy>

Google -

<https://policies.google.com/privacy>

Authorities: only to the extent we are obliged to by applicable laws and regulations.

The Ads

Why do we collect data for advertising purposes?

Our Ads services allow us and our publisher partners (most of the time our Ads partners are third party mobile application providers) to monetize advertising inventory by allowing advertisers to serve personalized advertising to users.

In order to deliver such services for its clients and partners, we can receive and process data for different legitimate purposes.

You will find below explanations regarding the reasons why we may collect data and the legal bases it relies on in each case.

To help our publisher partners monetize their ad inventory

Just like we rely on advertising to provide free apps and games, our partners can use the Ads services to monetize their ad inventory.

To help advertiser partners promote their products and services

The ads services help advertisers promoting their products and services to an audience that has demonstrated interests in similar products and services and allow them to optimize their marketing spends.

To improve our Ads services

We are committed to constantly improve the services delivered to its publishers and advertisers. In order to do so, the Ads processes the data listed below in a way that notably allows us to better understand how users interact with the ads of our advertiser partners and optimize their user experience.

For all these purposes we contractually oblige our partners to collect the express consent of their users before any data is sent to our Ads.

What data do we collect for advertising purposes?

For all the purposes listed above the data that we collect is limited to:

The apps you are using

Your IP address

Your Mobile Advertising ID (Apple IDFA or Google AAID - which are technical identifiers developed by mobile operating systems for advertising purposes which remain under your control and can be reset or erased at any time in your device settings)

Technical information about the device you use and your connection (user agent, type of connection, timestamp)

Data pertaining to your interactions with the advertisements served (e.g., number of ads served, potential clicks)

With who is your data shared & why?

Data collected for the purposes of our Ads services are only shared with the following categories of recipients and only to the extent such data is necessary for the purpose they are following:

Advertisers that are using our Ads services to serve personalized or non-personalized advertising.

Publishers that are using our Ads services to monetize their advertising inventory.

Security and other important information

How long do we keep your data?

Personal data collected, received and processed for the purposes described in this policy is not kept longer than necessary for the purposes described above in this section.

In all cases, we do not retain such data for more than 13 months.

#### Children data

We never knowingly or willingly collect any personal data concerning children under 16 years of age.

What rights do you have?

#### Consent withdrawal and opt-out of sale of information

You can change your consent status at any time from the Privacy Settings available in our mobile games and applications.

Please note that if we do not sell the personal information of our users, we may share it with third parties such as analytics and advertising companies in order to improve and personalize your experience and adapt the content and ads of our services.

Adjusting your consent settings within our apps and games, will allow you to block the collection of data for these purposes and will de facto prevent the sharing of information with our analytics and/or advertising partners.

#### Access right

Upon request, we will provide you with information about whether we hold any of your personal information. You may access or request deletion of your personal information directly in our mobile apps or by contacting our developer team via the developer email on the application page. We will respond to your request within a reasonable timeframe.

#### Rectification and erasure

You may request us the rectification of inaccurate personal data concerning you, as well as the completion of incomplete personal data. You may also request us to erase without undue delay your personal data when it is no longer necessary for us to retain such data.

In order for your data to be erased or rendered inaccessible you can either:

reset your mobile advertising identifier (IDFA on iOS, GAAID on Android) or activate “Limit Ad Tracking” in your device’ settings in order to make previously collected data non linkable to you or your device anymore and limit further data collection if you choose to enable the “Limit Ad Tracking” option

contact our developer team via the developer email on the application page, in order to have the data previously collected by us on you and/or your device permanently erased or anonymized

#### Portability

Upon request, we will provide you with the personal data that you provided to us and, if possible, will communicate this information directly to another data controller of your choice in a portable format when the processing is based on consent or contract.