

# PRIVACY POLICY OF PRINCESS MAKEUP DRAWING GAMES

## INTEREST-BASED ADS

Before sharing any information with advertising partners for the purposes of interest-based advertising, we will always ask for your consent. Based on your consent we share information we collect from you that can be used to personally identify your device, e.g. persistent identifiers such as advertising ID, IDFA, IP address and other information that may be personal to you, such as age and gender with our advertising partners and they can use such data for interest-based advertising. For example they can show you an ad based on your age and gender, they may attach the information gathered from our App to information gathered from other apps, websites, or via other services, and then build profiles, show you an ad based on such profile (for example they might know that device with your advertising ID has clicked on a sports ad within other publisher's app and show to you a sports ad in our App). In addition, we may use and share such information with our advertising partners to target and optimize our advertising and promotions in our and other publisher's apps.

We allow our advertising partners to show interest-based ads to you only if you have passed the age gate in our Apps and you have consented to the sharing of your personal information for the purposes of interest-based advertising.

Our advertising partners use different technologies for the purposes of interest-based advertising that process your personal information in different ways, so please review their data processing practices before you provide your consent to sharing your persistent identifiers such as advertising ID, IDFA, IP address and other information that may be personal to you for the purpose of interest-based advertising.

### WHO CAN SHOW INTEREST-BASED ADS TO ME?

Please see the following list of advertising providers that are allowed to show interest-based advertising and review their data processing practices, including the technologies they use for the purposes of interest-based advertising:

- Google (AdMob) <https://support.google.com/admob/answer/7665968>;  
[https://support.google.com/dfp\\_premium/answer/9012903](https://support.google.com/dfp_premium/answer/9012903)
- Google (AdWords) <https://policies.google.com/technologies/partner-sites?hl=en-GB>;  
[https://support.google.com/dfp\\_premium/answer/9012903](https://support.google.com/dfp_premium/answer/9012903)

## HOW CAN I TURN OFF INTEREST-BASED ADS?

You have an option to withdraw your consent to sharing your personal information for the purposes of interest-based advertising at all times. You can withdraw your consent by going to the app settings and clicking the interest-based ads button where you can manage your preferences by choosing to which advertising partner you allow to share your personal information for the purposes of interest-based advertising.

When you decide to withdraw your consent or if you do not provide your consent, you may still see the same number of ads on your mobile device; however, these ads may be less relevant because they won't be based on topics you like, your interest, behavior, demographics, etc. Our advertising partners may continue to show you ads based on the content of the application you are using.

# ABOUT US AND THIS PRIVACY POLICY

Your privacy is very important for us and we will always use your personal information only for the purposes as described in this Privacy Policy. As used in this Privacy Policy, "Serkan Gürsoy", "we", "us" or "our", "ours" refers to Serkan Gürsoy and all of its subsidiaries.

This Privacy Policy is part of and incorporated by reference into the End User License Agreement (the "EULA") governing the use of all "Serkan Gürsoy" branded software applications (the "App/s"), which may operate on any type of computing device (including without limitation, a mobile device), and applies to your use of the App.

This Privacy Policy covers how we collect, use, disclose, transfer and store information received about users from the European Economic Area, Switzerland,USA,UK and All of the World information received about All of the World users' computing devices through their use of the Apps. You can always determine your country of residence in the app settings by clicking a "Country" button and selecting your country.

We receive and/or you may be asked to provide your information (including personal information) any time you are in contact with us or use the Applications. As described in greater detail below, we share your information (including personal information) with our affiliates and with third party partners (as defined below) and use it in ways consistent with this Privacy Policy. We may also use your information (including personal information) together with other information to provide and improve products, services, content, and advertising.

## **INFORMATION WE COLLECT FROM YOU**

Most of the information that we collect about you comes directly from you when you play our Apps or interact with third party ads in our Apps or with our ads in other publisher's apps. In general, the information we collect about you relates to the type of device you are using, information that helps us identify your device, how you play our apps. We may also collect information from app store platforms and partners and other third parties such as information about your interests.

### **1. Technical Information**

We collect technical information about your device that is necessary for you to use our App and additional technical data that enables us to maintain and analyze the functioning of the App, to personalize the content of the App, and to display advertisements. Such information includes amongst others the type of device(s) you are using to play our Apps, persistent identifiers, such as IP address, device identifiers, ad identifiers, unique user ID specific for our Apps, and the country or region that you are playing in.

Persistent identifiers (such as IDFA, IDFV, Advertising ID, IP address) are identifiers that do not identify you personally but may uniquely identify your device. Such online identifiers provided by end user devices, applications, tools and protocols are considered as personal information according to *Europe & USA* data protection legislation.

We automatically collect certain information about your computing device, including:

- IP address; Country or region;
- IDFAs, IDFVs, Advertising IDs;
- Language; Locale (specific location where a given language is spoken);
- Time zone, session start/stop time,
- Network status (Wi-Fi, etc.), browser plug-in types and versions;
- User agent string (UA), platform, SDK version, timestamp;
- Technical device information (e.g. device model and name, operating system name and version, CPU information, storage size, screen size, firmware, software, mobile phone carrier, Internet service provider, API key identifier for application);

Additionally, for playing video advertisements through a video platform provider, we may collect additional information about your device, such as:

- "do not track" flag;
- page URL;
- Iso code of the country set on device;
- device date;
- whether Limit Ad is enabled or disabled;
- type of device (tablet or not).

In addition, for users of iOS devices we use IDFVs to track your use of our Apps.

## 2. Advertising and Application Usage Information

When you use our App, we collect additional information from you by using persistent identifiers that permit identification of your device. We collect information about how you play our Apps, how you interact with our ads in other publisher's apps and how you interact with third party ads that are shown to you in our Apps. Such information is used for delivering and improving our service, advertising, cross-promotion and analytics purposes.

*We collect information, including log information, that lets us know:*

- *Which advertisements are shown to you;*
- *How long an advertisement is visible to you, the size of the advertisement and the angle of view;*
- *How you interact with our ads in other publisher's apps and how you interact with third party ads that are shown to you in our Apps (if any), including clicks on ads;*
- *How you play our Apps (how often you play the app, for how long you use the app, the events that occur within the app, in-app progress, in-app purchases you make and their value, aggregated usage, performance data, life time value of user etc.);*

### *3. Classical Personal Information*

*We do not collect classical personal information through our Apps (such as your name, address, email or phone number) and you can use our Apps without providing us with your classical personal information. We will receive your classical personal information (such as your name, address, email or phone number) only when you contact us directly and will use such information only to respond to your inquiry.*

# **HOW WE USE YOUR INFORMATION**

## *1. In General*

*We use the information we collect about you/your device to deliver services and our App to you and to operate our business. We use it also for improving our services and App, for enhancing security and for analytics and research purposes to make sure we provide you with the best experience. In addition, we use your information to promote our services and Apps in our apps and also in other publisher's apps and to display third party advertisements to you. We use your information also for attribution and fraud prevention for advertising purposes and for complying with our legal obligations.*

*We use your information for the following purposes:*

- *Delivering and improving our services: We use your information for developing, delivering and improving our Apps and other products, services, and content, tailoring our products and services, providing App updates, technical trouble shooting, understanding and analyzing trends in connection with usage of the Apps, and administering the Apps.*
- *Displaying advertisements: We use your information for showing advertisements for our Apps in other publisher's apps and for displaying third party advertisements in our Apps.*
- *Attribution and fraud prevention for advertising purposes: We use your information for attribution how our advertising campaigns perform and for identifying and preventing fraud for our advertising campaigns. Also, we use your information for the purposes of attribution performance, ad visibility and privacy compliance of third party advertising campaigns in our Apps.*
- *Analytics and research: We use your information for understanding and analyzing trends in connection with the usage of the Apps, gathering demographic information about our user base, data about where the App was downloaded from. We may also create reports and analysis for the purposes of research or business intelligence, for example to track potential problems or trends with our Apps and services, or to test our new game features and content.*
- *Security: We use your information for enhancing the safety and security of our Apps, products and services.*
- *Customer Support: We use your information for providing customer support to you and to respond to your inquiries.*
- *Our legal obligations: We use your information when we are required to do so by law, for example we use your country or region for tax reporting purposes.*

## ***HOW WE SHARE YOUR INFORMATION***

*We cannot provide all services necessary for the successful operation of the Apps by ourselves. We must therefore share collected information with third parties, including analytics providers, attribution and fraud prevention providers, cloud service providers, third party advertising providers and their attribution and fraud*

prevention providers and other third party service providers that develop and support the Apps (collectively referred to as "Partners"). We share information that can be used to personally identify your device (e.g. persistent identifiers such as IDFA, IDFA, advertising ID and IP address) for the purposes of developing and delivering our services, displaying advertisements, conducting analysis and research and for measuring our and our Partners' advertising campaign performance. We also reserve the right to disclose your information (including personally identifiable information) when we are legally required to do so, to disclose your information in an anonymous and aggregated manner, meaning you could not be personally identified from it.

We may share such information to:

- Our analytics providers \_\_: We use third party analytics such as Firebase Analytics for the purposes of delivering our services, conducting analysis and research. To get more information about how your data is being collected and processed you can visit the site "How Google uses data when you use our partners' sites or apps" located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).
- Third party advertising partners \_\_: We have contracted with certain third party advertising networks that assist us in delivering advertising to you that allows us to continue offering the Apps for free or at low cost. Such third party advertising partners include but are not limited to advertising provider as Google Adword & Google Admob <https://www.google.com/ads/preferences/html/mobile-about.html>;
- Advertising partner's third party attribution provider \_\_: We allow our advertising partners to attribute impressions, clicks, installs or other advertising campaign performance indicators through their attribution providers for the purposes of measuring their advertising campaign performance. They may use their own third party attribution providers.
- Other third party service providers \_\_: For some Apps we use Unity Software to develop such Apps. For the data processing by Unity please see Unity's privacy policy available at <https://unity3d.com/legal/privacy-policy>. For some Apps we partner with third party developer studios to develop such Apps. Such third party developer studios do not have access to your personal information, they can only access aggregated data that they cannot trace back to you.

*We may contract with additional Partners or change existing Partners in the future to perform any services in connection with the Apps. These changes shall be updated twice a year or promptly in case of material changes in our data processing practices.*

*We reserve the right to disclose your information (including personally identifiable information) in response to law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations, users or user experience. Additionally, in the event of a reorganization, merger or sale we may transfer any and all information (including personally identifiable information) we collect to the relevant third party.*

*For any additional questions about third party information collection please refer to [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com).*

## **ADVERTISING**

*We offer our Apps for free or at low cost and in order to do that we need to share information we collect from you with our third party advertising partners that assist us in delivering advertisements to you. When you use our Apps we rely on our legitimate interest to show contextual advertisements to you. Before sharing any information with our advertising partners for the purposes of interest-based advertising, we will always ask for your consent.*

*When you use our Apps we show contextual advertisements to you. In order to enable advertising we allow our advertising partners to collect advertising identifiers (such as advertising IDFA on iOS) that are considered as personal information under Europe & USA data protection legislations, but they should use it solely for the purposes of contextual advertising. For any other purposes they should use the*

*information solely on an anonymized and aggregated basis, this means in a way that cannot be tracked back to your device.*

*If you have consented to sharing of your personal information for the purposes of interest-based advertising, the advertisements you see are more relevant to you and are based on your app and device usage, online behavior and interests (this is commonly referred to as online behavioral or interest-based advertising). Learn more about sharing of your personal information for the purposes of interest-based advertising in the "Interest-based Advertising" Section of this Privacy Policy.*

*Your privacy is important to us, so we follow not only applicable legislation, but also accepted market practices, such as respecting your privacy preferences on your device. You can choose to opt out of interest-based advertising via "Limit Ad Tracking" on your iOS device and all advertising providers are bound to comply with such a setting, but we cannot provide any guarantees on their behalf. If you choose to withdraw your consent available via our Apps, we will not share your advertising ID with advertisers for the purposes of interest-based advertising.*

*You can find the setting for your mobile device by following the directions below or contact your device provider.*

#### *IOS DEVICE*

- *iOS 7 or Higher*

*Go to your Settings \> Select Privacy \> Select Advertising \> Enable the "Limit Ad Tracking" setting*

- *iOS 6*

*Go to your Settings \> Select General \> Select About \> Select Advertising \> Enable the "Limit Ads Tracking" setting*

*More information about the iOS setting can be found here:*

*<https://support.apple.com/en-us/HT202074>*

# **THIRD PARTY TERMS AND CONDITIONS**

*Our Apps may contain links to third party websites, products, or services. For example, the Apps may feature offers from third party advertisers or the ability to engage in transactions with such entities. Please note that while using such third party offerings, you are using sites, products, and services developed and administered by people or companies not affiliated with or controlled by us. We cannot control the actions of those people or companies, the content of their sites, products or services, the use of information you provide to them, or any products or services they may offer. Our link to such third parties does not constitute our sponsorship of, or affiliation with, those people or companies. Nor is such linking an endorsement of such third party's privacy or information security policies or practices or their compliance with laws. Information collected by third parties, which may include such things as location information or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of third parties with which you interact.*

## **CHILDREN'S PRIVACY**

*We consider ourselves to be family oriented, however we have decided to voluntarily implement higher child protection standards even though our products and services are not directed to, and we do not knowingly collect personal information from children under the age of digital consent according to Europe & USA data protection legislation, with the sole exception of persistent identifiers as described below. If we learn that we have collected personal information other than persistent identifier of a child under the age of digital consent according to Europe & USA data protection legislation, we will take all reasonable steps to delete the information as soon as possible. If you become aware that your child has provided us with personal information without your consent, please contact us at [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com).*

*In order to preserve the family-friendly reputation of our Apps, we age-gated some of the features in our Apps, so that they are not available for use by children under the age of digital consent according to Europe & USA data protection legislation. The age gate is being conducted after the download of some of our Apps to assure the privacy and protection of younger users of our Apps. The features enabling potential collection and sharing of personally identifiable information, with the exception of persistent identifiers, are disabled for users who did not pass the age gate. For user's safety, it is not possible to change the age later. We do not store the year of birth of users who have identified themselves as below the age of digital consent according to Europe & USA data protection legislation in our Apps, but only the information that their unique user ID did not pass the age gate.*

*The only personal information we collect from users who have identified themselves as below the age of digital consent according to Europe & USA data protection legislation for the purposes of offering our services are persistent identifiers (such as device ID, IDFA, IDFV, advertising ID, IP address). Such persistent identifiers are used and shared with third parties only to place contextual advertisement (including frequency capping, fraud prevention and attribution and billing purposes), to authenticate users of or personalize the content on Apps, to maintain or analyze the functioning of the Apps, personalize the content of the App (such as sending push notifications), to perform network communications to protect the security or integrity of the user or the App, to ensure legal or regulatory compliance.*

*When using the persistent identifiers we will not contact users under the age of digital consent according to Europe data protection legislation, display behavioral advertising to them, nor do any user tracking or profiling. For the detailed information about disclosure to third parties please see section "How do we share your information" of this Privacy Policy. For the detailed information about disclosure to third party service providers used in relation to users under the age of digital consent. For any additional questions about third party information disclosure please contact us to [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com).*

## **YOUR RIGHTS**

*You have certain rights in connection with your personal information and how we handle it, i.e. you have a right to obtain information about whether we hold personal information about you, to access personal information we hold about you, to obtain the correction, update, amendment or deletion of your personal information and to turn to supervisory authority. Some of these rights may be subject to some exceptions or limitations. You can exercise these rights at any time by sending your requests regarding your personal information to [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com).*

*Your rights include:*

- *Right to object. You have the right to object to the processing of your personal information that is processed on the grounds of legitimate interests (see Legal Bases below). You are always free to opt out from the future collection of your personal information by us and our Partners by uninstalling all the Apps from each of your computing devices.*
- *Right of access. You have a right to know what information we hold about you and in some cases to have the information communicated to you. If you wish to exercise this right, please contact us by letting us know that you wish to exercise your right of access and what information in particular you would like to receive. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information. Please note that we may not be able to provide all the information you ask for, for instance if the information includes personal information about another person. Where we are not able to provide you with information that you have asked for, we will explain to you why. We will try to respond to any request for a right of access as soon as possible, but we will always do so within 1 month of receipt of your request and verification of your identity.*
- *Right to correct personal information. We try to keep the information that we hold about you accurate and up to date. Should you realize that any of the information that we hold about you is incorrect, please contact us via [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com) and we will correct it as soon as we can.*
- *Data deletion. You have a right to request deletion of the personal information that we hold about you. Should you wish to do that, please contact us via [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com). We reserve the right to ask to provide us additional information to verify your identity before we can start processing your request. Once we receive all information we need in order to be able to identify you, we will delete your personal information you requested us to delete as soon as possible, but we will always do so within 1*

*month of receipt of your request and verification of your identity. Please note that we may still retain some or all of that information, for example for complying with our legal obligations and protecting or enforcing legal rights. We may also retain your information in an anonymized form.*

- *Data portability. In some circumstances, you have the right to request that we provide you with the personal information which you have provided to us, so you can transfer this information to another data controller. Please contact us via [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com).*
- *Restriction of processing. In some cases, you may have the right to request a restriction of the processing of your personal information.*
- *Right to file a complaint. You have the right to file a complaint against us. To do so, contact the supervisory authority in your country of residence.*

## **GENERAL**

*Your privacy and security of your information is important to us and we always pay special attention to ensure that we process your information lawfully in accordance with one of the legal bases set out under Europe & USA data protection laws that apply to Europe & USA users. You can always determine your country of residence in the app settings by clicking a "Country" button and selecting your country. We have appointed a data protection officer, ePrivacy GmbH, Große Bleichen 21, 20354 Hamburg, to help us ensure compliance with Europe & USA data protection laws. We store your information for as long as needed to provide you with our services. We may store information longer, but only in a way that it cannot be tracked back to you. We operate globally and we share your information with our Partners as for the purposes described above in "How We Share Your Information" Section, which may include a transfer of your personal information outside of Europe & USA.*

## **LEGAL BASES**

*In each case where we process your information, we do so lawfully in accordance with one of the legal bases set out under Europe & USA data protection law.*

*The legal bases that we rely upon are the following:*

- *Contractual Necessity. This covers information that is processed by us in order to provide you with service that you have requested - and that we have agreed - to provide to you, that is to deliver and improve our services, to provide customer support, to deliver special features in our Apps.*
- *Legitimate Interests. This covers information that is processed by us for the purposes that can be reasonably expected within the context of your use of our services to pursue our legitimate interests in order to ensure you have the best experience when playing our apps, to make sure your information is secure and to provide to you our Apps free of charge or at a low cost. We pay special attention to your data protection rights making sure that your data protection rights are not overridden by our legitimate interests. We rely on our legitimate interests for data processing for analytics, attribution and fraud prevention, push-notifications, cross-promotion, and contextual advertising purposes.*
- *Consent. Where we ask for your consent to use your data for a particular purpose, we will make this clear at the point of collection and we will also make clear how you can withdraw your consent. We will ask for your consent before sharing any information with our advertising partners for the purposes of interest-based advertising and before conducting any surveys.*

## ***SECURITY***

*We have implemented appropriate technical and organizational measures to protect the confidentiality, security and integrity of the collected information, and to prevent unauthorized access and the use of information contrary to this Privacy Policy.*

*Although we use commercially reasonable efforts to assure that your information remains secure when maintained by us, please be aware that no security measures are perfect or impenetrable.*

# ***INTERNATIONAL TRANSFER***

*We operate globally, so we need to transfer your personal information to our affiliated entities and/or to other third party service providers across border and from your country to other countries around the world. Please note that not all these countries have the same data protection laws as your own country, but we will always take appropriate steps to safeguard the privacy of your personal information.*

*We will transfer your personal information only when the transfer is based on one of the following safeguards:*

- To a country with adequate data protection. We will transfer your personal information outside Europe & USA to a country that ensures an adequate level of protection in accordance with Europe & USA data protection legislation.*
- Based on standard contractual clauses. We will transfer your personal information to our Partner outside EEA, if we have entered into standard contractual clauses with such Partner, that are adopted by Commission of European Union in accordance with Europe & USA data protection legislation and are deemed to offer sufficient safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals (you can obtain a copy of the clauses by contacting us via [y.serkangursoy@gmail.com](mailto:y.serkangursoy@gmail.com)).*
- Based on an approved certification mechanism. We will transfer your personal information to our Partner outside Europe & USA if our Partner is certified by an approved certification mechanism pursuant to Europe & USA data protection legislation.*

## ***RETENTION***

*We store your information for as long as needed to provide you with our services. We may store information longer, but only in a way that it cannot be tracked back to*

*you. We delete the information as soon as we do not need it for the purposes as described in this Privacy Policy and in any event no later than five (5) years after your interaction with all our Apps has ceased.*

*When required by law, we will retain your information for as long as we are legally obligated to do so. If you request us to delete your data will delete your data as described above in "Your Rights" Section.*

## ***CHANGES TO OUR PRIVACY POLICY***

*We will occasionally update this Privacy Policy as necessary to protect our users, furnish current information, and respond to legal and technical changes.*

## ***CONTACT US***

*If you have questions or concerns about Privacy Policy, please contact us through one of the following ways:*

- 1. for privacy questions and exercising your rights via our privacy email:  
y.serkangursoy@gmail.com;*
- 2. for general information please feel free to contact us via our customer service page: <http://toysofcloud.com>;*