

Privacy Policy

Effective as of: [2026/8/5]

We are [Spinzo Ltd] (“we”, “us”, or “our”). We provide the [Pool Champion] (“App” or “Service”) to our users (“you”). To do that, we need information about you. Protecting your privacy is really important to us. This Privacy Policy will help you understand what information we collect, how we use it and what choices you have when you use the App.

I. Personal info we collect

We collect your personal info including:

device identifiers (such as IDFA, IDFA for Android, GAID for IOS).

behavioral usage of the App.

the type and operator of network (such as Mac address).

the type, version, brand, language and operating system of device.

email address.

II. How we use the personal info we collect

We use and disclose your personal info in accordance with the legal bases set out below:

To provide our Services to you, respond to inquiries and fulfill requests.

To deliver and tailor our communications with you.

To monitor, analyze, protect, test, and improve our services and operations.

To comply with applicable law or respond to legal process.

To protect our own rights, property, and operations.

III. Who we share info with

We will not share any personal info that we have collected from or about you except as described below:

Our service providers, to work with us to administer and provide the Services.

Our subsidiaries and affiliates that provide services to us so we can more seamlessly operate, support, and improve the Services.

Our marketing, advertising, and analytics partners.

Government and law enforcement officials or private parties to enforce and comply with the law.

IV. Third-party websites and services

We allow interactions with third parties to make your experience better, but our Policy doesn't and can't apply to third parties. If you click on links to external websites or services that are operated by third parties, they may collect, use, and disclose your personal info pursuant to their own policies (not ours). Including a link to or from third-party services doesn't mean we've endorsed their practices. We're unable to guarantee that independent third parties adhere to the same practices as us, so please be sure to read their policies and terms before disclosing personal info to them.

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

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

Google AdMob & Firebase: <https://policies.google.com/privacy>

Pangle: <https://www.pangleglobal.com/zh/privacy/partner-en>

Facebook: https://www.facebook.com/privacy/policy/?entry_point=comet_dropdown

Mintegral: <https://www.mintegral.com/cn/privacy>

V.How we keep your personal info safe

We have appropriate legal, organizational and technical security measures in place to prevent your personal info from being accidentally lost, used or accessed in an unauthorized way, improperly altered or disclosed. We also limit access to your personal info to employees, agents, contractors, and other third parties who have a business need to know. They will only process your personal info on our instructions and they are subject to a duty of confidentiality. We also have put in place procedures to deal with any suspected personal info breach.

VI.How long we will keep your personal info

We keep your personal info for as long as we need to provide the App to you and fulfill the purposes set out in this Policy. When we no longer need to use your personal info and there is no need for us to keep it to comply with our legal or regulatory obligations, we will either remove it from our systems or anonymize it so that it can no longer be associated with you. When removing personal info, we will take commercially reasonable and technically feasible measures to make said personal info irrecoverable or irreproducible.

VII.Children

Children are not allowed to use the Services, and we do not knowingly collect personal info from them. We define “children” as anyone under 13 years old or the age needed to consent to the processing of personal data in that region. Verifiable parental consent is required for the collection, use, or disclosure of a child’s personal info. We will not collect, use, or disclose any personal info from a child if their parent or guardian does not provide such consent.

VIII.Your rights, choices, and controls

You may have some or all the rights listed below:

Access: The right to obtain confirmation as to whether your personal info is being processed, to know what personal info we have about you.

Data portability: The right in certain cases, to receive the personal info concerning you in a structured, commonly used and machine-readable format.

Correction: The right to have rectified any inaccurate personal info concerning you.

Right to withdraw consent: Where your consent is required, you may at any time withdraw such consent (though this will not affect the lawfulness of any processing of your personal info prior to that).

IX.Updates and revisions

We’ll update this Policy from time to time to reflect changes in technology, law, our business operations, or any other reason we determine is necessary or appropriate. When we do make changes, we’ll update the effective date at the top of the Policy and post it on this page. We

encourage you to check back periodically to review this Policy for any changes since your last visit.

X.Contact us

If you have any questions or concerns about this Policy or our privacy practices, please send them to us via email at [\[spinzowalter@gmail.com\]](mailto:spinzowalter@gmail.com).