

Totebo Ltd Privacy Policy

Our approach to Privacy

Totebo Ltd and all its related entities consider your privacy to be very important. As a UK company we strictly comply with UK privacy laws.

This Policy outlines the types of personally identifiable information and other data that we will collect from you through the various websites, games and applications we provide ("Products and Services"), and how we might use or disclose such information and data to third parties. Your installation and/or use of these Websites/Apps and/or submission of information to us constitute your consent to this Privacy Policy.

Collection of Information

We collect two types of information through your use of our products and services:

- "Personal Information" information that can specifically be linked to you personally, such as your full name, physical address, email address, telephone number, photograph, location, credit card information and user names
- Non-personal "Usage Data" anonymous data about how you use and or interact with our products and services that is tied to your computer or device through which you use our products and service.

We receive and store any information you give to us, when you: download our games; enter our competitions; are involved in our special events (e.g. focus testing days); interact with our social media such as Facebook and Twitter; enter information on our Website; purchase our merchandise; subscribe to our newsletters or other information feeds; make an in-app purchase; request technical support, make a compliment or complaint, or otherwise contact us or give us your information in another way.

We also receive and store certain types of information when you interact with our products or services including:

- Information about how you use our Products and Services. We use this information to continually improve our products and their features as well as our services. When you sign-in to our games over social media, we use the information from that provider so that you can enjoy the same game on multiple devices, pick up where you left-off, and interact with your friends
- information about the device you use to access our products and services such as its model, operating system, screen resolution, web browser, IP address, Media Access Control (MAC) address, Advertising Identifier, Language and other technical information such as cookies and randomly generated unique identifiers

- your location so we know what language to use and so that we can provide the relevant games/features/promotions/advertisements that are applicable to your location; and
- if you "tell a friend," "email this page," or use another similar features, we will collect information to perform this feature for you

Advertising identifier (IDFA)

Our games use the advertising identifier of your device (IDFA) to provide you with relevant adverts. This identifier is sent to our chosen advertisement networks but not stored on our servers.

Third Parties

Please note that your access to and use of our Products and Services may be subject to certain third party terms and conditions and we are not liable for any such third parties' use of your personal data. Certain Products and Services, may use third party services to provide authentication with a gaming console ID, social networking ID, or gaming network account. In connection with such use, certain personally identifiable user and/or membership data may be transferred automatically to and from us. Sometimes we collect information about you from third parties, such as Apple, Facebook, or Google, Inc. We collect this information so that we can deliver services to you that you have requested. We collect this information:

- when you purchase our Products and Services via the App Store, or Google Play Store, or other Storefront
- if you log into our Products or Services via a social media account (such as Facebook or when you use in-app features such as Game Center)

Usage of Information

We will use your Personal Information to provide you with any goods, services, or functionality you've requested or respond to any inquiries you've made. We may also use your Personal Information in order to contact you to promote our Websites/Apps, contests and any specials we may offer. In the event that we send you advertising or marketing materials, we will provide you with the opportunity to opt-out of receiving such materials in the future. You may also opt-out of receiving such materials at any time in accordance with the instructions provided in this Privacy Policy.

Usage Data may be used by us for administrative, analytical, research, optimization, security and other purposes. Specifically, we may use your Usage Data to help us learn more about your gaming activities, personalize your content, compile statistics, respond to customer service inquiries, provide security and to otherwise enhance your gaming experience.

Usage Data may also be used to help us provide you advertising that better suits your interests. Geolocation information will be used to determine the jurisdiction in which you're located so we can determine what set of laws apply to you. Your device ID may be used so we can send you push notifications (if you choose to allow that function) and track your use of our Websites/Apps so that we can better understand your preferences and tendencies which will help us best personalize your experience and provide you with in-game offers and notifications that are tailored to you.

We may provide aggregated or anonymous information to third parties for the purposes of developing and delivering targeted advertising. We will not provide your personal information to advertisers.

We may use information held about you to verify your compliance with our Terms of Service.

When Do We Disclose Information?

We may disclose the personal information we hold about you in the following circumstances:

- If we are required or authorised to disclose by law or by a law enforcement agency;
- To our business partners in the course of providing our Products and Services to you, or generally in the conduct of our business. This may include organisations who provide services to us, such as payment processors or hosting services
- To avoid, lessen or prevent a serious emergency or crime. If we use or disclose personal information about you in those circumstances we will make a written record of such use or disclosure.

Children's Privacy

While our Products and Services may be played and/or visited by children, we do not knowingly collect or use any Personal Information from children under the age of 13 and hereby specifically prohibit any user under the age of 13 from providing us with any Personal Information. If you are a parent of a child under 13 years of age and you believe your child has provided us with Personal Information, please contact us at marketing@totebo.com and we will delete the information from our system.

We may collect a device ID or other persistent identifier linked to the device or computer that may be used by a child to play our Products and Services. The data collected will be anonymous and not tied to any Personal Information.

If you permit your child to use one of our Products and Services you should disable in app purchases on your phone or device and actively monitor your child's use.

Direct Marketing

We may use your information to tell you about our Products and Services and share news about us and our new games we are launching, events we are running, or merchandise we sell. You can always opt-out if you don't want to receive this news or information.

In-app Purchase

Some of our products and Services offer in-app purchases or items or additional features you can purchase (for real or in-game currency). If you don't want to make in-app purchases, don't use these options and consider disabling them on your device.

Opting-out

Ways to opt-out of our Services:

- via email, there will be an unsubscribe link
- via Facebook you can 'unlike' our page
- via twitter you can stop following us

For assistance with opting out please contact us at marketing@totebo.com

Storage & Security

We follow generally accepted industry standards and maintain reasonable safeguards to attempt to ensure the security, integrity and privacy of the information in our possession.

Access & Correction

You may request access to your personal information at any time by sending a written request to our Privacy Officer at marketing@totebo.com

We may charge a small fee for providing access if it requires a significant amount of time to locate your information or to collect or present it in an appropriate form. We may decline your access if there are reasonable grounds to do so. If your information changes, let us know so that we can update our records. If you would like us to de-activate your records that we hold, please tell us. Once de-activated your data will not be accessible. However, due to system

backups to various types of data storage media, your data may in some circumstances remain on these types of data storage media. There may be circumstances where we decline to de-activate your records.

Complaints Contacts

If you have any concerns or complaints about your privacy please contact us by sending a written request to our Privacy Officer by mail at:

marketing@totebo.com

We will respond to your complaint within a reasonable time after we receive it, provided you supply return contact details.

Updates to this Policy

We will update this Privacy Policy from time to time. These updates, will take effect from the date of issue on our website at www.totebo.com. Please check back regularly for updates.

Definitions

- Totebo Ltd ("us") - its assignees, licensees, successors in title and subsidiaries.
- Products and Services - Products and Services offered by us and includes our games, websites and related services.
- Game Center - A central game hub that retains information regarding game play statistics that is openly shared with the user. This includes high scores, global leaderboards, friends lists and in-game achievements.
- Storefront - An online business presence for sales. We work with the Apple App Store and Google Play storefronts as their primary storefront for sales but our games may also be available on Amazon App Store and Windows Phone Store, among others.
- Analytics - Interpretation and interpolation of unidentified data to predict and isolate trends relating to game play and app use.
- In-app purchase - An in-game system that allows exchanging real money for virtual goods or in-game currency.
- Third party services - Services provided by a provider that is not owned or controlled by us.