KELIME AVCISI PRIVACY POLICY

Last Updated: [Sep 30st, 2021]

At **Unique Game Studio** ("we," "us," or "our"), we respect the privacy of our users ("users" or "you"). We designed this Privacy Notice ("Notice") to help you understand how we collect, use, disclose, and safeguard your information. This Notice applies when you download, install, register with, or use the mobile application, or any other mobile applications that directly reference or link to this Notice (collectively, the "App"), or when you interact with us in connection with the App ("Communications," and together with the "App," our "Services"). This Notice does not apply to information collected from any of our other products or services that have separate privacy policies and that do not directly reference or incorporate this Notice.

Please carefully read this Notice to understand our practices with respect to your information and the choices you have. Your use of the Services is subject to this Notice and the [Terms of Service]. Your consent to process and disclose your Personal Data to our Service Partners for marketing and third-party analytic purposes as described in this Notice is the contractual consideration for the provision of our Services. If you do not agree with our practices, <u>DO NOT</u> download, install, register with, or use the Services.

This Notice may change from time-to-time and will become effective when we post the revised Notice on the Services. Please refer to Section 11 ("Updates to this Notice") for more information.

Our Notice describes the following about our Services:

- 1. Information We Collect and How We Collect It
- 2. Automatic Information Collection and Tracking Technologies
- 3. How We Use Your Information
- 4. How We Share Your Information
- 5. Your Choices
- 6. Third-Party Platforms
- 7. Children's Privacy
- 8. Our Commitment to Security
- 9. Data Retention
- 10. Additional Information for Users in the European Union ("EU")
- 11. Additional Information for Residents of California
- 12. How to Exercise Your Rights
- 13. How You Can Contact Us
- 14. Updates to this Notice

1. Information We Collect and How We Collect It

When you interact with our Services, we collect information about you, which includes Personal Data. "Personal Data" means information that identifies or relates to you, or as this term is defined under applicable privacy or data protection laws. We collect Personal Data:

- Directly from you when you provide it to us;
- Automatically from you and your mobile device; and

From third parties.

Information You Provide to Us

We collect Personal Data that you provide to us, including:

- Contact Information: If you need assistance with the Services or have a question for us, we
 will ask you to provide contact details, including your name and email address. We use this
 information to communicate with you;
- Customer Support Information: When you contact us, we also collect the content of your
 messages, such as details about the issues you are experiencing or other questions you have
 about our Services.
- **Game Profile Information**: When using the Services, you may be able to voluntarily add information to your game profile, such as a nickname. Please be aware that other users are able to view the information you voluntarily provide in your game profile.
- **Voluntary Information:** Information you voluntarily provide when you interact with us via social media, including on Twitter, Facebook, YouTube, and Instagram.

Information We Automatically Collect From You or Your Device

When you download, install, register with, or use the Services, we receive and store Personal Data about you and your mobile device(s) using technologies that automatically collect such information. Depending on your mobile device operating system, we automatically collect the following categories of Personal Data:

- **Device Information**: We collect information about the mobile device(s) you use to interact with the Services, including unique device identifiers, Internet protocol ("IP") address, operating system, and other similar information;
- Usage Information: We also collect information about your interactions with the Services, including the dates and times you use the Services, how often you use the Services, in-game actions and achievements, the content you access or view in our Services, whether you view advertisements shown in the Services, and, if so, how many times you view the advertisements, and other similar information;
- **Geolocation Data**: We collect general location information, such as information we derive from your IP address or other device settings in order to tailor our Services to you, such as to understand which version of the Services to install on your device (e.g., in which language), and to otherwise deliver and maintain the Services.
- **Device Event Information**: We collect information about errors your encounter, including crash reports, request and referral URLs and other details about whether you encountered an error playing the Services or lost connection to the Internet; and
- Cookies, Tracking, and Ad Serving Technologies: We use cookies and similar tracking technologies to collect information about your interactions with our Services, which includes, for example, any advertising content a third-party displayed to you and whether you engaged with it, links you have visited from the Services and other similar information. Please refer to Section 2 ("Automatic Information Collection and Tracking Technologies") below for more information about the technologies and tracking tools we and third parties may use on your mobile device(s).

Information We Collect from Third Parties

Depending on how you interact with the Services, we collect Personal Data about you from third-party sources, including:

Advertising Platforms and Analytics Providers: The advertising platforms and analytics
providers with whom we partner provide us with information about your interactions with the

- Services, including, for example, whether, and how many times you may have viewed an advertisement, the length of time the advertisement was visible, and other similar information.
- Mobile Application Providers: We may receive information about you from the Mobile
 Application Provider when you download the Services from the application store (e.g., Apple
 iTunes, Google Play, etc.) (collectively, "Mobile Application Provider"), such as your location
 and device information in order to provide you with the correct version of the Services.
- 1. Automatic Information Collection and Tracking Technologies

Cookies and Similar Technologies

When you use our Services, we and our third-party partners collect information about you and your mobile device(s) through cookies and similar technologies:

- Cookies: A cookie is a small file placed on your mobile device both by us and by third parties with whom we have a relationship, such as analytic services and advertising network services. Cookies generally contain a unique identification code, which is tied to data stored on our or our third parties' servers. Cookies help us and our third-party partners track and understand how you interact with our Services, provide a more personalized experience, allow you to more easily login to the Services, and provide you with advertisements based on your browsing activities and interests. For more information on your choices regarding the use of cookies, please see Section 5 ("Your Choices") below.
- Advertising Identifiers: Our third-party advertising partners may use advertising identifiers, such as Apple's Identifier for Advertising ("IDFA") and Google's Advertising Identifier ("AID"), which, similar to cookies, allow our third-party advertising partners to recognize your device when you interact with our Services and to provide you with advertisements that match your interests. You can reset your advertising identifiers at any time via the settings on your mobile device, as described in Section 5 ("Your Choices") below.
- Internet Log Files: We use internet log files, which contain data such as your IP address, in order to monitor traffic on our Services, resolve technical problems with the Services, detect and prevent fraud, and other similar purposes.

Analytic Technologies

We use our own servers as well as third party analytic technologies, which are integrated into our Services, to gather information about how you use our Services. These analytics technologies help us, for example, to measure and analyze events within our Services, improve your user experience, monitor the success of marketing campaigns, or to prevent mobile advertising fraud.

- Cross-device Tracking
- •We do not engage in cross-device tracking.
- Third-Party Information Collection
- •Some of the functions within the Services are provided, developed, or hosted by third parties that are not affiliated with Unique Game Studio. These entities may process information automatically as you use the Services. These third parties include:
 - Advertisers, ad networks, and advertising servers that serve behavioral advertisements, including:
 ironSource

https://developers.ironsrc.com/ironsource-mobile/unity/ironsource-mobile-privacy-policy/

- AdMob https://policies.google.com/privacy
- UnityAds https://unity3d.com/legal/gdpr
- Facebook https://www.facebook.com/business/gdpr
- -AppLovin https://www.applovin.com/privacy/
- •Analytics companies, which help us understand and measure how the Services are being used, including:
 - Appsflyer https://www.appsflyer.com/privacy-policy/
 - Firebase https://firebase.google.com/support/privacy
 - Tenjin https://www.tenjin.io/privacy/

•Service providers we engage for administrative and support activities, such as customer support services or cloud storage providers.

The information these third parties collect may include Personal Data as well as information about your online activities over time and across different websites, apps, and other online services websites that are not affiliated with Unique Game Studio. They may use this information to provide you with interest-based (e.g., behavioral) advertising or other targeted content.

We do not control these third parties' technologies or how they collect, use, or disclose your Personal Data. For more information on third-party practices, please contact the third party directly or refer to such third parties' privacy policies, terms of use, end user license agreements, and other similar disclosures. If you have questions about which third parties may have access to your Personal Data through your use of the Services, contact us using the details provided in Section 13 ("How You Can Contact Us"), below.

1. How We Use Your Information

We use the Personal Data we collect about you to operate our Services and to enhance the quality of your experience, including to:

- Provide you with the Services, its contents, and any information that you request from us;
- Operate and improve our Services;
- Help you to find other users on our Services by entering their Assigned Identifiers into the App's search field;
- Serve and measure the effectiveness of advertising displayed on our Services (e.g., behavioral advertising);
- Authenticate your activity and save your progress and achievements on our Services;
- Store information about your preferences and customize our Services according to your preferences;
- Provide software updates to our Services;
- Identify and troubleshoot issues or errors on our Services;
- Detect security incidents, protect against malicious, deceptive, or illegal activity;
- Carry out anti-fraud and anti-cheating measures against behaviors prohibited under our Terms of Service, to ensure that we provide a fair experience to all users; and
- Make legal or regulatory disclosures and to establish, exercise, or defend legal claims.

We also use your Personal Data, including your Contact Information, to provide you with support and to personalize our communications with you, including to:

- Communicate with you in order to provide technical support;
- Answer questions you have about our Services; and
- Share updates about our Services, such as relevant security issues or updates, which are not promotional in nature

1. How We Share Your Information

We may disclose the Personal Data we collect about you to third parties, which include:

 Service Providers: Third parties we engage to support our business and who are bound by contractual obligations to keep your Personal Data confidential and use it only for the business purposes for which we have disclosed it;

- Adverting Partners: We allow third-party advertising networks to integrate technologies and similar tracking tools identified in Section 2 ("Automatic Information Collection and Tracking Technologies") above. These advertising partners may use your Personal Data (and similar information they collect from other websites and services) for purposes of delivering targeted advertisements to you (also called "interest-based adverting" or "online behavioral advertising.");
- Successors or Bankruptcy: We may disclose your Personal Data to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us about our Services' users is among the assets transferred; and
- Government and Law Enforcement: We may disclose your Personal Data if permitted or required by law or in response to a law enforcement or other legal request and/or to comply with a judicial proceeding, court order, or legal process.

We also share your Personal Data to:

- For any other purpose disclosed by us when you provide the information; and
- With your consent.

We may share aggregated information with third parties, without restriction.

1. Your Choices

You have certain choices regarding your Personal Data, including:

- Cookies: You may be able to disable cookies by adjusting the permissions on your device. Cookie settings vary depending on the type of device and operating system you use, so refer to instructions related to your particular device to learn more about cookie-related and other privacy and security settings that may be available. Please note that if you reject certain cookies, you may still use the Services, but your ability to use some features or areas may be limited.
- Advertising Identifiers: You may choose to prevent your mobile device's advertising identifier from being used for interest-based advertising, or you may reset your device's advertising identifier. These settings vary depending on the type of device you use. If you use Apple iOS, you can reset your advertising identifier by going to: Settings > Privacy, tap Advertising, and then tap "Reset Advertising Identifier." If you use an Android device, you can head to: Settings > Google > Ads > Reset advertising ID, and click "OK" when prompted.
- **Push Notifications**: You can opt not to receive push notifications from our Services by following the instructions in your mobile application or device settings.
- Do Not Track: Currently, we do not alter our data collection and use practices in response to Do-Not-Track signals.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. Some of these third parties may participate in the Digital Advertising Alliance's Self-Regulatory Program for Online Behavioral Advertising, which you can learn more about by visiting their website detailing choices for mobile applications. Some of these third parties also may be members of the Network Advertising Initiative ("NAI"), and you can learn about your opt-out options from members by visiting NAI's website.

1. Third-Party Platforms

Our Services contains links to other websites. Unique Game Studio has no responsibility when you enter other websites using links from our Services. Unique Game Studio does not control these other websites and cannot guarantee the safety and security of their privacy practices. If you provide any information to these third parties, different rules may govern the collection and use of your Personal Data by such third parties.

We recommend that you review privacy policies of these third parties before providing information to them, as their practices may differ from those set forth in this Notice. You should contact these entities directly if you have any questions about their privacy practices.

1. Children's Privacy

The Services are not intended for children under sixteen (16) years of age, and we do not knowingly collect Personal Data from children under sixteen (16). If we have collected or received Personal Data from a child under sixteen (16) without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under sixteen (16), please contact us using the communication methods identified in Section 13 ("How You Can Contact Us").

1. Our Commitment to Security

The security of your Personal Data is important to us. Unique Game Studio maintains commercially reasonable security safeguards that are designed to protect the Personal Data we collect against unauthorized access, use, disclosure, alteration, or destruction.

Despite the steps we take to protect your Personal Data, no method of transmission over the Internet or method of electronic storage is 100% secure. Unique Game Studio cannot guarantee or warrant the security or integrity of your information and shall not be liable for breaches of security or integrity, third-party interception in transit, or any damage caused to your computer or other property by visiting our Services. If you have any questions about the security of our Services, you can contact us using the communication methods identified in Section 13 ("How You Can Contact Us").

1. Data Retention

We will store and maintain your Personal Data for as long as needed to carry out the purposes described in this Notice or as otherwise required by applicable law, unless we are required or permitted by law to keep this information for a longer period of time.

We determine our retention periods by taking into account various criteria, including the type of Services requested by or provided to you, the nature and length of our relationship with you, the possibility of your re-enrollment with our Services, the impact on the Services we provide if we delete some Personal Data from or about you, and mandatory retention periods provided by law and the statute of limitations.

1. Additional Information for Users in the European Union ("EU")

Legal Basis for Processing
Where we use your information to:

- Provide you with the Services, its contents, and any information that you request from us;
- Operate and improve our Services;

- Help you to find other users on our Services by entering their Assigned Identifiers into the App's search field;
- Authenticate your activity and save your progress and achievements on our Services;
- Store information about your preferences and customize our Services according to your preferences;
- Provide software updates to our Services;
- Identify and troubleshoot issues or errors on our Services;
- Detect security incidents, protect against malicious, deceptive, or illegal activity; or
- Carry out anti-fraud and anti-cheating measures against behaviors prohibited under our Terms of Service, to ensure that we provide a fair experience to all users.

The processing of your Personal Data is necessary for the performance of our contract with you or for the purposes of our legitimate interest not overridden by your interests or fundamental rights and freedoms.

Where we use your information to make legal or regulatory disclosures and to establish, exercise, or defend legal claims the processing of your Personal Data is necessary for compliance with a legal obligation or for the purposes of our legitimate interest not overridden by your interests or fundamental rights and freedoms.

Where we use your information to serve and measure the effectiveness of advertising displayed on our Services (e.g., behavioral advertising) processing is based on your or, if you are under the age of sixteen (16), the consent of the holder of parental responsibility over you.

International Data Transfers

The data that we collect from you will be transferred to, processed and stored at, a destination outside the European Economic Area ("EEA"), including in Japan. It may furthermore be shared with the third parties described in Section 4 ("How We Share Your Information), which may be located outside the EEA, including in Japan, the State of Israel and the USA. The EU Commission considers Japan, the State of Israel and the USA (limited to the Privacy Shield Framework), countries that offer an adequate level of data protection. A copy of the adequacy decisions of the EU commission for Japan and the State of Israel can be obtained here:

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2019.076.01.0001.01.ENG&toc=O J:L:2019:076:TOC (Japan) and

(https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011D0061 (State of Israel).

The following third parties, with which share information, are EU-U.S. Privacy Shield. More information on the EU-U.S. Privacy Shield certification and the status can be obtained here: Google LLC:

https://www.privacyshield.gov/participant?id=a2zt000000001L5AAl&status=Active Facebook Inc.:

https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active Amazon Web Services Inc.:

https://www.privacyshield.gov/participant?id=a2zt0000000TOWQAA4&status=Active AppLovin Corporation

https://www.privacyshield.gov/participant?id=a2zt0000000TNsVAAW&status=Active

Where we transfer Personal Data to countries outside the EEA that do not provide for an adequate level of data protection, we implement appropriate and suitable safeguards, such as EU Standard Contractual Clauses, in order to protect your Personal Data. A copy can be obtained by contacting us, using the details provided in Section 13 ("How You Can Contact Us)". We will take all steps reasonably necessary to ensure that your data is treated securely and subject to appropriate safeguards in accordance with this Notice and applicable data protection law.

Your Rights

You may at any time exercise certain rights you may have under applicable data protection law within its limitations, including the following rights:

- The right to request access to your Personal Data, which includes the right to obtain confirmation from us as to whether or not Personal Data concerning you is being processed, and where that is the case, access to the Personal Data and information related to how it is processed.
- The right to rectification or erasure of your Personal Data, which includes the right to have incomplete Personal Data completed, including by means of providing a supplementary statement, certain rights to request us to erase your Personal Data without undue delay.
- The right to restrict the processing of your Personal Data, which includes restricting us from
 continuing to process your Personal Data under certain circumstances (e.g., where you
 contest the accuracy of your Personal Data, processing is unlawful, your Personal Data is no
 longer needed for the purposes of processing, or you have otherwise objected to processing
 related to automated individual decision-making).
- The right to data portability, which includes certain rights to have your Personal Data transmitted from us to another controller.
- Where data processing is based on your consent, the right to withdraw your consent at any time with effect for the future.
- The right to lodge a complaint with a competent supervisory authority, including for users in the United Kingdom of Great Britain and Northern Ireland the Information Commissioner's Office (https://ico.org.uk/) and for users in Germany, the German supervisory authorities, a list of which can be obtained here:

https://www.bfdi.bund.de/DE/Infothek/Anschriften Links/anschriften links-node.html.

You have the right to object at any time, on grounds relating to your particular situation, to the processing of your Personal Data for purposes of our legitimate interest. We will no longer process your Personal Data unless we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms, or if the processing serves for the establishment, exercise or defense of legal claims.

You also have the right to object to the processing of your Personal Data for marketing purposes, including profiling for such purposes, at any time.

You can exercise your rights by contacting us, using the details provided in Section 13 ("How You Can Contact Us)".

Provision of Personal Data is a Contractual Requirement

Unless indicated otherwise in this Notice, the provision of Personal Data is a contractual requirement or a requirement necessary to enter into the contract for the Services. If you do not agree with our practices described in this Notice you MUST NOT install, register with, or use the Services.

1. Additional Information for Residents of California

If you are a resident of California, the California Consumer Privacy Act ("CCPA") provides you with additional rights regarding your Personal Data.

CCPA Privacy Disclosures

In the preceding twelve (12) months (the "Applicable Period"), we have collected the following categories of Personal Data about you, as defined in the CCPA, including:

- Identifiers (e.g., name, email address, user account and device identifiers);
- **Commercial Information** (e.g., records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);

- Internet or Other Similar Network Activity (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement);
- Geolocation Data; and
- Inferences Drawn from Personal Information (e.g., such as profiles reflecting your preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes).

We collect these categories of Personal Data from the sources described in Section 1 ("Information We Collect and How We Collect It") above, including directly from you, automatically when you use the Services, or from third parties.

During the Applicable Period, we have used or disclosed the categories of Personal Data for the following business purposes:

- Auditing interactions, including counting ad impressions to unique visitors, verifying
 positioning and quality of ad impressions, and auditing compliance with this specification and
 other standards:
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Providing you services including providing customer service, verifying your information, providing advertising or marketing services, providing analytics or similar services on behalf of the business or service provider;
- Undertaking internal research for technological development and demonstration (i.e., to develop new products or features); and
- Undertaking activities to maintain the quality or safety of the Services and to improve, upgrade, or enhance the Services.

We also have used and disclosed your Personal Data for commercial purposes in order to provide you with our Services including through our third-party advertising activities, as we describe in Section 2("Automatic Information Collection and Advertising") and Section 3 ("How We Use Your Information") of this Notice.

During the Applicable Period, we may have disclosed your Personal Data for business or commercial purposes, including to the following categories of third parties:

Categories of Personal Data	Categories of Third Parties to Whom Personal Data is Disclosed	
Identifiers (e.g., name, email address, user account and device identifiers)	Service ProvidersAdvertisingPartners	
Commercial Information (e.g., records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	Service ProvidersAdvertisingPartners	
Internet or Other Similar Network Activity (e.g., browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement)	Service ProvidersAdvertisingPartners	
Geolocation Data	Service ProvidersAdvertisingPartners	

Inferences Drawn from Personal Information (e.g., such as profiles		Service Providers
reflecting your preferences, characteristics, trends, predispositions,		Advertising
behavior, attitudes, intelligence, abilities and aptitudes)	Partners	

Your Rights

As a California resident, in addition to the choices described above in Section 5 ("Your Choices"), you have the following rights:

- **Right to Access Specific Information**: You may request the specific pieces of Personal data that we have collected about you.
- Right to Know about our Collection and Disclosure Practices: You may request that we
 describe the categories of Personal Data we have collected about you, the categories of
 sources from which the Personal Data is collected, the categories of Personal Data that we
 have [sold or] disclosed for a business purpose about you, the categories of third parties to
 whom the Personal Data was [sold or] disclosed for a business purpose, and the business or
 commercial purpose for collecting [or selling] the Personal Data.
- Right to Deletion. You may request that we delete Personal Data we have collected from you, subject to certain exceptions.
- Right to Opt-Out of Sales. You may request that we not sell your Personal Data to third
 parties. The term "sale" is defined broadly under the California Consumer Privacy Act. To the
 extent that "sale" under the CCPA is interpreted to include interest-based advertising or other
 data uses described in the Section 5 ("Your Choices") above, we will comply with applicable
 law as to those activities. To opt out of receiving interest-based advertising, you can exercise
 your choice by using your device's or browser's privacy settings.
- Right to Non-Discrimination. We will not discriminate against you for exercising any of your
 privacy rights under CCPA or applicable law, including by, denying you Services, providing
 you a different level of Services, or suggesting that you will receive a different level of quality
 of goods or services.

Shine the Light

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Services who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us using the contact details in Section 13 ("How You Can Contact Us") below.

1. How to Exercise Your Rights

To exercise your rights:

- Following this << <u>webmaster.bilgii@icloud.com</u> >> to our mail adress.
- Writing to us at []:
 - Please identify whether you seek to exercise your rights under the GDPR or the CCPA, as well as information about the right you are seeking to;
 - Please include in your message information sufficient for us to verify your identity.

Our ability to locate your Personal Data is limited by the accuracy and the completeness of the information that you provide.

We will confirm receipt of your requests within ten (10) business days, and respond within time allotted by applicable law, unless additional time is needed, in which case we will provide notice and an explanation of the reason. If you are a resident in the EU, we will respond within thirty calendar (30) days. For California residents, we will respond within forty-five (45) days.

Before we can process your request, we need to verify your identity. During the verification process, depending on the nature of your request (e.g., whether you are seeking access to specific pieces of Personal Data or requesting a deletion of your Personal Data) we will verify your identity against known information in our databases, such as the Player Identification number we assign, which is available in the settings menu of the game, and User Name and All receipt of In App Purchases. We may deny a request, in whole or in part, if we cannot verify your identity.

How to Exercise Rights for Someone Else

You also may designate an authorized agent to make a request for you. To use an authorized agent, we may require: (1) your signed permission designating the authorized agent; (2) evidence that the authorized agency has power of attorney; or (3) for residents in California, proof that the authorized agent is registered with the California Secretary of State and that you have authorized such authorized agent to be able to act on your behalf. We may deny a request from an authorized agent who does not submit sufficient proof.

1. How You Can Contact Us

If you have any questions or comments about our Notice or would like to exercise your privacy choices or rights, you may:

• Contact us by e-mail at: [webmaster.bilgii@icloud.com]

Data Controller

Unique Game Studio, Uskudar/istanbul, Turkey is the controller for the processing your Personal Data as described in this Notice.

[Our data protection officer may be contacted at [webmaster.bilgii@icloud.com]

1. Updates to this Notice

We may update our Notice from time to time. If we make material changes to how we treat our users' Persona Data, we will post the new Notice here with the "Last Updated" date legend.