

Privacy Policy

Last updated: September 1, 2024

Introduction

This policy gives a description on how Ocean38 Studio (“us”, “we”, or “our”) collects, uses, shares, and protects information about you for our games on mobile devices, PCs, or on other platforms in order to provide you with excellent service and develop our products.

All Ocean38 Studio activities regarding marketing, advertising, and other services (“Services”) are governed by this Privacy Policy. Using or accessing a Service on any platform means that you agree to the use of your information in compliance with this Privacy Policy. This policy also describes how you can withhold or withdraw your consent to the use of your data, including for targeted advertisements, and how to request to know about, correct, or delete the information we hold.

Ocean38 Studio is dedicated to transparency, data privacy, and security, and follows the strict regulations required by the CCPA (California Consumer Privacy Act), LGPD(Lei Geral de Proteção de Dados) and GDPR (General Data Protection Regulation), as detailed in this privacy policy.

If you have any concerns, please contact us using the methods provided in the Contact Us section of this document. If you disagree with your information being used as described in this Privacy Policy, please do not install or use the Services.

Information Collection

Your information is collected at the start of using our games and/or other Services. We use this data to provide you with better game experiences and services for the purpose of optimization, preventing fraud, and for marketing and advertising. We may also collect information from advertising platforms and partners and other third parties such as information about purchases and interests.

We may collect and process the following types of information:

- The type of your device, IP address, your game ID when using the app, and the country or region that you’re playing in;

- Details about your gameplay on our app, including: amount of time played, if you have left the game on a specific level or if you have cleared it, and your scores on levels, and items you own or use;

- Purchase history on behalf of our payment service providers to keep a record on if a purchase has been successfully made.

- We do not collect credit card information. Information we collect via cookies and other similar technologies, as explained further below;

- Communications between you and us, whether in-game, via email, or through social media channels. We keep a record of these communications to provide customer service by answering your

questions and providing you with a better experience using our app;

Information from our other group companies or other third party companies who have your consent or have other legal rights to share granted information with us (advertising networks and publishing partners, platforms). This may include your interests, other games you played, demographic and general location information. We use this information as described in this Privacy Policy;

Information as further set out in this Privacy Policy, including social sharing features , marketing and advertising If you choose not to connect to your social network accounts when using our games, we still collect anonymous information. There will still be device level identifiers and other information described here, but there will be no personally identifiable information.

We may ask for your approval to collect other information in some circumstances from you or your device. If this situation arises, we will inform you what information we are to collect, the reason we collect it, and how we will be using that information.

How do we use your information

Information Usage and Sharing

Optimizing Our Services We analyze and optimize to provide you the best possible products by using your information from the use of our Services and analysis of de-identified or aggregated data to analyze the performance of our games, troubleshoot problems, verify that our websites work properly on all devices, create updates, and develop and improve the quality of our products.

Customer Services

We may use your information delivered or provided directly to us in any communications in terms of customer service and through its channels will be used. We may use such information to contact you and to manage your account and relationship with us to improve your experience in our Services.

Analytics and Research

We collect information using analytics tools such as third party analytics tools to see how you play our games or use our Services. Those tools may contain cookies or other similar tracking technologies. We may use your data for research and analytics purposes to engage with you directly. We may also create reports, analysis or similar services for use by us for the purposes of research or business intelligence.

Other Usage and Sharing

The other main way that we use and share information is for marketing and advertising reasons. This usage is described in more detail below. We do not sell your information.

Marketing

We may serve ads based on your information we collect about you within our Services, or place ads on third party websites, apps and internet-connected devices. This information may include:

- Ad identifiers and other non-personal information collected from your device
- Your interactions with our game and Services, including game play information
- Your age, country or region, and gender
- Other information collected from third parties who have obtained your consent or have a legal right to share it with us.

This information is used to try to make sure that you only see marketing from us that you are interested in, including our other games. Please note that if you opt-out, you may still have advertisements in the game, but they will not be targeted advertisements (advertisements that are tailored to your interests by using your information).

Marketing Partners

There are various third party marketing partners we use to help market our games. With the help of your information collected when you use their services, they make assumptions to ensure that most relevant advertising that you would prefer to see is presented and evaluate the effectiveness of advertisements.

This Privacy Policy does not cover the data use of our marketing partners, but they are required to have a legal basis to use your data for marketing purposes and to provide you the details on how it's being used. For more information we recommend for you to read our partners' privacy policies on their websites

Marketing Partners

- Adjust – <https://www.adjust.com/terms/privacy-policy/>
- Google Ads – <https://policies.google.com/privacy?hl=en>
- Facebook – https://www.facebook.com/full_data_use_policy
- Applovin – <https://www.applovin.com/privacy>
- Mintegral – <https://www.mintegral.com/cn/privacy>
- Unityads – <https://unity3d.com/legal/privacy-policy>

Advertising

Our games include advertising for third party products and services. We and our partners use your information to improve advertising and targeting for third party ads that are shown in our games. This information is used to make sure that the ads that you see might be of interest to you or relevant to you.

This information may include:

- Ad identifiers and other non-personal information collected from your device
- Your interactions with our game and Services, including game play information
- Your age, country or region, and gender
- Other information collected from third parties who have obtained your consent or have a legal right to share it with us.

Please note that if you opt-out, you may still have advertisements in the game, but they will not be targeted advertisements (advertisements that are tailored to your interests by using your information).

Advertising Partners

Non-personal identifiers and other information that is collected from your device when you play our games or use our Services may be shared with advertising partners in order to deliver ads to your device. Such information may be combined with information that our advertising partners collect separately to serve you with more relevant ads (targeted ads) and to enhance the accuracy of their targeting. For more information we recommend for you to scan through our partners' privacy policies on their websites

Ad Identifiers

We use ad identifiers that are non-permanent, non-personal identifiers such as the Android and/or Apple's ID for advertising associated with your device, and similar technologies such as tracking pixels within ads to provide interest-based advertising. These technologies enable us and our third party advertising partners to recognize you and your device, allow our Services to interact with a third party social network or platform, and help our payment processors to complete your payment instructions.

Your Rights and Control of Data

Right of Access / Right to Know

All users have a right to know what information we collect about them and how we use or share that information. If you wish to know which information we collect and hold about you, please use the methods described in the Contact Us section so we can verify your identity to provide you with requested information. You may only request your own

personal information, and information will not be provided about other users. You will be required to follow the verification process listed under the “Verification Process” section below for security reasons.

Information Correctness

If there is any information we hold about you that you would like to correct, please let us know using one of the methods listed in the Contact Us section. We will make corrections as soon as possible. You will be required to follow the verification process listed under the “Verification Process” section below for security reasons.

Data Retention and Deletion

How long we retain your information depends on why we collected it and how we use it. We generally retain your personal information as long as your account is active and for no longer than is necessary for the purpose for which such personal information is processed. Please note, however, that we may retain and use your personal information as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements and rights, or if it is not technically and reasonably feasible to remove such information from our databases. Consistent with these requirements, we will endeavor to delete your personal information promptly upon your written request.

Verification process

If you request to know about, correct, or delete your personal information, you will be required to open the relevant game to send us a second message using the in-app messaging system to allow us to verify your user ID and use that ID to retrieve any requested information. Without this step we will not be able to verify and provide information related to your account.

Data Portability

You have the right to request the data provided to us to be transferred to another data controller in some circumstances according to the laws in the country where you live.

Restriction of Processing

You may request a restriction of the processing of your data in some circumstances according to the laws in the country where you live.

Right to Object

You have the right to object to the processing of your personal data in some circumstances according to the laws in the country where you live.

Authorized Agents

Authorized agents, including parents or guardians, may make a request on behalf of the user in the same ways as listed above. If you have any questions, please contact us using one of the methods listed in the Contact Us section.

Opt Out

Direct marketing Please follow the opt out link included with our marketing communications (such as emails) if you would not like to receive direct marketing communications from us. If you receive more than one type of marketing communications, you may need to opt out of all of them individually. A few days might take for our records to be effectively updated.

Push Notifications We may occasionally use push notifications to send you game updates or other services-related notifications that may be important to you. You may opt out from receiving these types of communications at any time by turning them off for your phone or tablet settings.

Preferences for Advertising You may reset your ad identifier being used for interest-based advertising by changing the settings of your device, usually found under “privacy” or “ads”. If you would like to withdraw your consent for targeting advertisements, please contact us using one of the methods in the Contact Us section. Please note that if you opt-out, you may still have advertisements in the game, but they will not be targeted advertisements (advertisements that are tailored to your interests by using your information).

Other Important Policies

California Privacy Rights

According to the California Consumer Privacy Act (CCPA), users who are California residents may request and obtain a list of the Third Parties to whom we have disclosed their personal information (if any) and the type of personal information disclosed to those parties during the prior calendar year. This list may be requested once per year and free of charge.

Non-Discrimination

Users have the right to not receive discriminatory treatment by the business for exercising privacy rights according to the CCPA and other relevant data privacy laws and regulations.

Updates to Our Privacy Policy and Practices

We may revise this Privacy Policy from time to time, as needed. We will notify you via our apps if there are any material changes that affect your use of our services, as required by applicable laws. Changes will also be posted on this website, and the revised version will be applicable immediately after it is posted or notice is received. If you continue to use our services after any changes have been made, you hereby provide your consent to the changes.

We commit to provide information to our users before using their information for any new purpose not stated in this Privacy Policy and give

them the opportunity to opt out if they do not agree. If consent for information usage or processing is required by law or contract, Sonio Studio will comply with the law or contract.

Contact Us

If you have any questions or concerns about this Privacy Policy, including to exercise any of your rights, there are several ways to contact us: email to huechung2024@gmail.com

