

PRIVACY POLICY

Our applications at Tribune Games Mobile Studios are highly serious in protecting the privacy rights of our users (“users” or “you”). This Privacy Policy (the “Policy”) describes the ways we collect, store, use, and manage the information including personal information, that you provide or we collect, we believe that your privacy is really important to us or any of our game provided on a mobile platform (collectively, the “Service”). Please note that the scope of this Policy is limited to information collected or received by Tribune Games Mobile Studios through your use of the Service. We are not responsible for the actions of third party people or companies, the content of their sites, the use of information you provide to them, or any products or services they may offer. Any link to those sites or placements by those sites does not constitute our sponsorship of, or affiliation with, those people or companies. This Policy describes the personally identifiable information and other data that we will collect from you through the apps and games we provide, and how we will use and when we might display such data to third parties. Your installation and/or use of these Apps and/or submission of information to us establish your consent to this Privacy Policy and the processing of your information (personal and non-personal) as described in this policy. Please don’t use the Services if you do not agree to this Privacy Policy.

1. INFORMATION WE COLLECT FROM YOU

Most of the information that we collect about you comes directly from you when you visit our website, play our Games or interact with third-party ads in our Games or with our ads in other publisher’s Games. 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 Games and may include information that you submit to us when you voluntarily contact us. We may also collect information from app store platforms and partners and other third parties such as information about your interests and in-app purchases (provided that we never receive your payment or credit card information).

The information that we may collect about you through the Services broadly falls into the following categories:

(a) Information that you provide voluntarily

Certain parts of our Services may ask you to provide personal information voluntarily. For example, we will ask for certain information in order for you to submit enquiries to us, such as your name, email address or other details, necessary to process your inquiries; any information you submit to our support team via email.

The personal information that you are asked to provide and the reasons why you are asked to provide it, we will try to explain to you at the point we ask you to provide your personal information.

You also may provide your personal information to us via our website, for example, when submitting job application form (for more see 6.3. Job applicants) or publishing form (for more see 6.4. Developers).

(b) Information that we collect automatically

When you use our Services, we may also collect certain information automatically from you and/or your device which may be considered personal information under applicable data protection laws, such as:

Data and analytics about your use of our Services (e.g. in-game play progress, levels, games played, session length, preferred settings, which in-game adverts you may have viewed, in-game references or just game preferences, the means by which you were referred to our Services)

Your IP address and device identifiers such as your Advertising ID, Device ID numbers (for more see here Advertising IDs and Device IDs)

Your device type and the operating system that you use

Your Service communications (e.g. in-game emotion signals which you exchange with other players)

Broad geographic location (e.g. country or city-level location) based on your IP address

- Information collected automatically through our Website (or third-party services employed in our Website), which can include, for example, IP addresses or domain names of the computers utilized by the you when using our Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by you, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or your IT environment

Advertising ID means Apple Identifier for Advertisers (“IDFA”) on Apple and Google Advertising Identity (“GAID”). These are unique identifiers for mobile device that advertisers use for personalized advertising. They are consistent across all mobile applications and thus

allow cross-app tracking. On Apple, you can opt out of it by choosing “limit ad tracking” option in your privacy settings. On Google Android, you can opt out of these ads by choosing “Opt-out of personalized ads”. Advertising IDs are non-permanent, non-personal identifiers, which are uniquely associated with your device.

Device identifier / information means device type, device model, device maker, device operating system and its language or other technical data like screen size or processor, or combination of this data available from a device for a developer for checking the device compatibility with a particular application.

Some of this information may be collected through cookies as explained further under the heading Cookies below.

(c) Information we obtain from third-party sources

Third-Party Social Network/s. Google Play Games Service, Apple Game Center, Facebook (“Third-Party Social Network/s”). You may choose to connect to our Services via your social media account. Exactly what information we receive from your social media will depend on your social media privacy settings, but it would typically include your basic public profile information such as your username, gender, your friends playing the same Game. (See below also “Third-Party Social Networks”).

Third party service providers. We may receive personal information about you from third-party sources. We may get your personal information for example when you installed our Game and prior to installing you have clicked an advertisement for the same Game.

Advertising partners. From time to time, we may also receive personal information about you from other third-party sources. For example, if you clicked on an advertisement to direct you to one of our Services (such as an advert of one of our Games in other publisher’s game), we will

be provided with information from which ad network and advertising campaign the install originated from (See below also “Advertising”).

A list of our current service providers and partners is available [here](#)

(d) No special categories of information

We do not request or intend to collect any “special categories of information” such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation. Kindly be cautious when sharing this information about yourself (or others) in our Services.

2. HOW WE USE YOUR INFORMATION

2.1. In General

We use the information we collect about you/your device to deliver services and our Games to you and to operate our business. We use it also for improving our services and Games, 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 Games in our Games and also in other publisher’s apps and to display third-party advertisements to you. We use your information also for tracking and fraud prevention for advertising purposes, for complying with our legal obligations and for our legitimate interests (for example, when we use your personal information for evaluation of possible employment relations with you).

We use your information for the following purposes:

1. Delivering and improving our services. We use your information for developing, delivering

and improving our Games and other products, services, and content, tailoring our products and services, providing Game updates, technical troubleshooting, understanding and analyzing trends in connection with usage of the Games, and administering the Games

2. Displaying advertisements. We use your information for showing advertisements for our Games in other publisher's apps and for displaying third-party advertisements in our Games. Please see more in Advertising Section of this Privacy Policy.

3. Cross-promotion. We use your information for cross-promoting our Games and services, meaning to promote one of our Games while you are playing a different Game of ours.

4. Tracking and fraud prevention for advertising purposes. We use your information for tracking how our advertising campaigns perform and for identifying and preventing fraud for our advertising campaigns.

5. Analytics and research. We use your information for understanding and analyzing trends in connection with the usage of the Games, gathering demographic information about our user base, data about where the Game 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 Games and services, or to test our new game features and content.

6. Security. We use your information for enhancing the safety and security of our Games, products and services.

7. Customer Support. We use your information for providing customer support to you and to respond to your inquiries.

8. 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.

9. Entering a contract with you. We use your information when we are required to carry out pre-contractual measures, for example, before our employment relationship.

2.2. In-App Purchases

Our Games enable in-app purchases. We do not process payments for in-app purchases nor have access to your credit card information.

Payment transactions for in-app purchases are completed through the app store via your App Store account, Google Play account or Amazon.com account (payment service providers). You are requested to provide your payment details and personal information directly to such payment service providers. We are not involved in the collection and processing of such information: instead, we will only receive a notification by the relevant payment service provider as to whether payment has been successfully completed.

Any post-purchase processes are controlled by the Apple, Google and Amazon.com stores and are subject to specific terms of such Apple, Google and Amazon.com stores. Please review privacy policy and terms of service of your Apple, Google and Amazon.com stores.

Log Data

We want to inform you that whenever you use our Service, apps or games, in a case of an error in the app we collect data and information (through third party products) on your phone called Log Data. This Log Data may include information such as your device Internet Protocol ("IP") address, device name, operating system version, the configuration of the app when utilizing our Service, the time and date of your use of the Service, and other statistics.

Cookies

Cookies are files with small amount of data that is commonly used an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your device internal memory. This Service does not use these “cookies” explicitly. However, the app may use third party code and libraries that use “cookies” to collection information and to improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

3. HOW WE SHARE YOUR INFORMATION

We cannot provide all services necessary for the successful operation of the Games by ourselves. We must, therefore, share collected information with third parties 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 TapJoy, Unity, Firebase for the purposes of delivering our services, conducting analysis, and research. The device data we share with such providers are encoded. The providers may assign a random ID to these data and they are not able to match it back to You. We can aggregate the data for benchmarking feature.

Our cloud service providers. We store information we collect from you on servers provided by our third-party cloud service providers such as iCloud, Google Cloud Platform;

Our tracking and fraud prevention providers. For some of our Games we use tracking and fraud prevention providers, such as AppsFlyer, Tenjin for the purposes of measuring performance and optimizing our advertising campaigns, displaying advertisements, conducting analysis to improve our services and for fraud prevention purposes. Such providers may use APIs, and SDKs in our Games to enable them to collect and analyze user and device-related data and information, such as impressions, clicks, installs or other advertising campaign performance indicators and post-install in-app events.

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 Games for free or at low cost.

Advertising partner's third-party tracking provider. We allow our advertising partners to track impressions, clicks, installs or other advertising campaign performance indicators through their tracking providers for the purposes of measuring their advertising campaign performance. They may use their own third-party tracking providers.

Other third-party service providers. For our Games, we use Unity Software to develop such Games. For the data processing by Unity please see Unity's privacy policy available at <https://unity3d.com/legal/privacy-policy>. For some Games, we partner with third-party development studios to develop such Games. Such third-party development 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 Games. These changes shall be updated from time to time 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, the 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 **tribunegamesstudios@gmail.com**