

Privacy Policy of Luckyboy Games

We respect your privacy.

Lucky Boy Games And its Affiliates (“Lucky Boy Games” or “we”) are dedicated to protecting the privacy rights of our online users (“users” or “you”). It also describes the choices available to you regarding our use of your personal information and how you can access this information. We respect the privacy of our mobile applications users and we take protecting it seriously.

Permissions we use:

We use your Device IDFA for third party advertising.

Analytics:

We may collect Crash or ANRs data to improve the app or game. We may record session length to improve the overall experience of the App/Game.

We knowingly not collect any data under the age of 13.

Consent:

We ask for your consent at the start of the App/Game

We Use Ironsource mediation. You can also visit their privacy policy by going to the following links.

Ironsource: <https://developers.is.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>

Admob:

<https://support.google.com/admob/answer/10502938?hl=en>

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

Unity:

<https://unity3d.com/legal/privacy-policy>

Vungle: <https://vungle.com/privacy/>

Meta Audience Network:

<https://audiencenetwork.pl/en/privacy-policy/#:~:text=Our%20data%20protection%20officer's%20contact,to%20directly%20access%20other%20websites.>

ironSource Mobile Ltd. Privacy Policy

Effective Date: November 4, 2021

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About Us

ironSource Mobile Ltd. (“ironSource Mobile”) operates 3 main services:

- **Ad Network** – We have a network that connects app developers with advertisers, and helps app developers to serve ads on their apps. App developers means the company or individual that developed and operates the mobile app that is integrated with or otherwise sends information to ironSource Mobile. Advertiser is a company or an individual that advertises its products or services within the app.
- **Mediation Platform** – A platform that helps app developers to manage all the ad providers with which they have a direct relationship (e.g. ironSource Mobile ad network, third party ad networks, additional online advertising companies, etc.) that serve ads on their apps.
- **Marketing Platform** – We help advertisers to create and optimize advertising campaigns.

We collect information in either of 2 ways:

- **Directly** – from your device through our SDK integrated by app developers in their apps. SDK, or a Software Development Kit, is a software component that allows us to serve ads in a mobile app, and to collect information directly from the end users of such app.
- **Indirectly** – through other ad networks with which we engage in order to serve you with ads, or by receiving information from our advertisers.

We collect information as described in this privacy policy for ironSource Mobile’s own purposes, as a data controller under data protection law where relevant, except as otherwise indicated herein.

Scope

This privacy policy describes ironSource Mobile’s privacy practices with respect to information it processes through its ad network, mediation platform, and marketing platform. This privacy policy does not govern the use of our website, dashboard for publishers, and dashboard for advertisers.

ironSource Mobile serves ads to users all around the world. Accordingly, throughout the document, we try to harmonize our approach and the language of the privacy policy as much as possible. However, sometimes we refer to specific laws that require further disclosures. For example, whenever you see throughout the policy the annotation “The GDPR angle”, it means that the purpose of such section is to satisfy the transparency requirements of the General Data Protection Regulation (the “GDPR”), and therefore it applies only to personal data (as defined by the GDPR) associated with devices who we deem to be located in the European Economic Area, United Kingdom, or Switzerland. In addition, if you are a resident of Nevada, please see “The Nevada Angle” for information related to Nevada privacy rights”. If you are a resident of California, please see “The CCPA Angle” for information related to the California Consumer Privacy Act (the “CCPA”). “The CCPA Angle” sections apply only to “personal information” that is subject to the CCPA. For purposes of the CCPA, this Privacy Policy serves as both the Privacy Policy and Notice at Collection of Personal Information.

Information We Collect

- **Information collected directly from you through our SDK, and information provided to us by a third party ad network (“Ad Network Information”) –**

Identifiers: Your Advertising ID, IP address. The term Advertising ID refers to the Google Advertising ID on Android devices, and ID For Advertising (“IDFA”) or ID For Vendor (“IDFV”) on iOS devices. The Advertising ID is a resettable persistent identifier generated by Android or iOS that allows online advertising companies to recognize your device across non-affiliated apps, for purposes such as frequency capping, attribution, fraud detection, personalized advertising, and whitelisting. You can find additional information about how to limit our use of your Advertising ID under “How to Control Your Information”.

General technical information about your device: The ironSource Mobile SDK version, your time zone, the amount of free memory on your device, the name and version of the app to which the ad is served, battery status, limit ad tracking status,

operating system name and version, timestamp, the name of the manufacturer of the device, the language of the operating system, the name of the mobile carrier, internet connection type (e.g. WiFi).

Interaction with our ads: An indication if you viewed or clicked on an ad.

- **Information received (through our SDK) from app developers that are integrated with our mediation platform (“Mediation Information”)** – The app developer can choose to share with us the following information: your age, gender, in-app purchases, advance in the game, and such other information provided by the app developer.
- **Information received from advertisers (through the advertiser itself or through a third party in behalf of such advertiser) (“Advertiser Information”)**

Identifiers: Your advertising ID, IP address.

Campaign information: an indication that you installed the advertiser’s app following a click on or a view of an ad served by us or otherwise; information about actions you performed within an advertiser’s app following such an install, such as in-app purchases, and level in the game.

How We Use the Information We Collect

As stated above, we perform 3 main services. For each such service, we use the information we collect in different ways. Below is a general description of how we use your information across our services:

- **Serving Ads on App Developers’ Apps** – We use the Ad Network Information collected from your device to serve ads on app developers’ apps. More specifically, we use such information for the following purposes:
 - Ad delivery: we use your Ad Network Information to technically enable the delivering of ads to your device.
 - Reporting, billing and attribution: We use your Ad Network Information to generate reports for our publishers and bill advertisers and publishers, including for ensuring that if you interacted with our ads, we will receive payment for our service.

- Internal Operations: We use your Ad Network Information for internal operations, such as debugging, support, security, and improving our services.
- Fraud detection and prevention: We use your Ad Network Information for detecting and preventing fraud, and for ensuring viewability of our ads.
- Optimization and frequency capping: We use your Ad Network Information for optimizing advertising campaigns, including for limiting the number of times you view a specific campaign across our network, or the number of ads you view in a specific app.
- Personalized advertising: Advertisers may use your Ad Network Information for personalized advertising (i.e. ads that are based on your interest or profile).
- **Operating our Mediation Platform** – We use your Advertising ID, IP address, and Mediation Information collected from your device to operate our mediation platform. More specifically, we use such information for the following purposes:
 - Reporting: We generate reports for the app developers using our mediation platform in order to allow them to better understand their audience in terms of interaction with ads.
 - Segmentation: We allow app developers to create segments based on parameters they configure in our mediation platform. Such segmentation allows them to use different ad networks and different ad units for different segments of users. However, this feature does not allow them to serve you with personalized advertising, as app developers cannot control the content of the ads served by different networks.
 - Sending ad requests on behalf of the app developer: In addition to the other information used to operate the mediation platform, we use the Ad Network Information in order to send ad requests on behalf of the app developer to ad networks with which the app developer has direct contractual relationship, but due to technical reasons, we are in the best position to populate the ad request with the Ad Network Information.
- **Operating our Marketing Platform** – We use the Advertiser Information received from our advertisers to operate our marketing platform. More specifically, we use such information for the following purposes:
 - Optimizing advertising campaigns: We optimize campaigns for our advertisers based, for example, on events that happen in their app or indications of installs received from other apps.
 - Suppression: We use device IDs of users of an advertiser's app in order not to serve advertising campaigns of such advertiser to such users, as they already have the advertiser's app.

- Whitelisting/blacklisting: We allow advertisers to upload lists of device IDs to include/exclude in their advertising campaigns.
- **Compliance with legal obligations** – We may use your Ad Network Information, Mediation Information, and Advertiser Information to comply with applicable legal obligations.

The GDPR Angle:

- **We act as controllers and process personal data on the basis of legitimate interest** – When we process Ad Network Information for the purposes of operating our ad network, including for purposes listed above, such as optimization and frequency capping, fraud detection and prevention, and internal operations, we process such personal data on the basis of our legitimate interest or the legitimate interests of our app developers.
- **We also act as a processor** – When we process Mediation Information for the purpose of operating our mediation platform on behalf of app developers, and certain Advertiser Information on behalf of advertisers, we act as their processors. For any request to exercise your individual rights related to such processing (including the rights of access, rectification, erasure, portability, and the right to restriction and/or object to processing), you should contact the relevant app developer.
- **Interest Based Advertising in the European Economic Area, United Kingdom, and Switzerland** – At the moment, we do not serve interest based ads to users who are located in the European Economic Area, United Kingdom, and Switzerland.
- **Legal necessity** – We may process your Ad Network Information, your Mediation Information, and your Advertiser Information for compliance with applicable legal obligations.

The CCPA Angle:

- **We act as “service providers”** – In many cases, we act as a service provider to collect personal information from, or on behalf of, customers who use our services. These customers

have their own privacy policies that describe how they use information. To the extent that we are processing personal information subject to the CCPA on behalf of a customer in our role as a service provider, you should reach out to that customer directly to exercise your rights under the CCPA.

- The remainder of this section provides disclosures for users for cases where we are not acting as a service provider to a customer.
- **Personal Information We Collect, Disclose for a Business Purpose, and Sell** – We collect the categories of personal information about California users identified in the chart below. As further set forth in the chart below, in the past 12 months, we have disclosed and sold personal information about California users to third parties for business or commercial purposes.

Categories of Personal Information	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:	Sold to the following categories of third parties:
Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	See the “About Us” Section	See the “How We Use the Information We Collect” Section	See the “How We Share Your Information” Section	All categories listed below.

Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	See the “About Us” Section	See the “How We Use the Information We Collect” Section	See the “How We Share Your Information” Section	All categories listed below.
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Geolocation information	See the “About Us” Section	See the “How We Use the Information We Collect” Section	See the “How We Share Your Information” Section	All categories listed below.
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Other information about you that is linked to the personal information above	See the “About Us” Section	See the “How We Use the Information We Collect” Section	See the “How We Share Your Information” Section	All categories listed below.
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- **Recipients of California Personal Information** – Although we do not sell personal information for monetary consideration, we do sell personal information, subject to the choices with respect to “sale” of personal information communicated to us by the app developer from which our services are available, to the categories of third parties listed below, under the definition of “sale” in the CCPA:
 - Advertising/marketing companies;
 - Advertising networks;
 - Game publishers;
 - App developers; and
 - Attribution companies.
- **Maximum Information Retention Period:**

We will retain your personal data included in Ad Network Information, Mediation Information, and Advertiser Information for the longer of: (i) a period of up to 2 years from the date such information is first stored in our systems; or (ii) a period of 3 months from the last appearance of your Advertising ID in our systems.

How We Share Your Information:

- We share your Ad Network Information with:
 - Other advertising partners** – for the purpose of receiving advertising campaigns from such advertising partners.
 - Our corporate affiliates** – from which we receive services, such as IT, security, storage, delivery of advertising campaigns, and other internal operations.
 - Advertisers** – for the purposes of attribution and whitelisting/blacklisting, as stated above.
 - Service providers** – We share your Ad Network Information, Mediation Information, and Advertiser Information with our service providers for the purpose of receiving services such as fraud detection and prevention, viewability measurement, reporting, and storage.
 - Viewability measurement** – Please note that certain versions of our SDK may include software libraries that allow advertisers to verify if their ads were actually viewed.

How to Control Your Information

Interest based ads – We collect and transfer Ad Network Information to other entities (including advertisers, other ad networks, and third parties acting on behalf of these types of entities) that use the information described in this Privacy Policy for serving you with interest based ads (i.e. ads that are based on your interests or profile).

Opt out from interest based ads – If you do not want us to transfer your information to third parties for interest based ads, please follow the below instructions:

iOS devices: go to Settings > Privacy > Advertising > enable Limit Ad Tracking. Please note that if you use more than one device, you need to opt-out separately in each device.

Android devices: Please follow the instructions set forth at: <https://support.google.com/ads/answer/2662922?hl=en>. Please note that if you use more than one device, you need to opt-out separately in each device.

Scope of the opt-out – Note that if you reset your advertising ID through your device's platform settings, you should follow the steps above to reset your opt-out choice. In addition, opting out may not stop data from being collected from your device or transferred for other, non-personalized advertising purposes such as optimization, reporting, frequency capping, internal operations, and fraud prevention. If you become aware of any third party that received your Ad Network Information from us, and that does not respect your choices, please let us know by contacting us at: dpo@ironsrc.com.

The GDPR Angle:

- **Data subject rights** – Please note that you have the right to request from us access to and rectification or erasure of your personal data we process as controllers, or to restrict or to object to processing of your personal data in accordance with the provisions of the GDPR. To submit a request for exercising your rights, please use one of the following ways:
 - For access and erasure requests, submit your request through our online form, which can be accessed at https://ironsrc.formtitan.com/Data_Subject_Request
 - For other data subject requests, please send an email with your request to the following address: privacy-request@ironsrc.com

Please note that we will process your request subject to verification of your identity.

- **Complaint to supervisory authority** – You also have the right to file a complaint with the relevant supervisory authority (e.g. of your country or domicile) where ironSource has not addressed your concerns.

The CCPA Angle:

- **Your Rights Regarding Personal Information** – California residents have certain rights with respect to the personal information collected by businesses. If you are a California resident, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:
 - The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either sold or disclosed for a business purpose, and the categories of third parties with which we have shared personal information.
 - The right to request that we **delete the personal information** we have collected from you or maintain about you.
 - The right to **opt out of our sale(s) of your personal information**. Please note that if you opt out of certain types of sales, we will be unable to provide you with the services that rely on such sales.
 - The right **not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.
- **Exercise your rights** – To exercise any of the above rights, please use one of the following ways:
 - For exercising your rights to know or to delete personal information, submit your request through our online form, which can be accessed at https://ironsrc.formtitan.com/Data_Subject_Request
 - Alternatively, you may send an email with your request to the following address: privacy-request@ironsrc.com

For more information on how you can exercise your rights you may also call our toll-free phone number: +1(888)244-7212

- **Verification Process and Required Information** – Note that we may need to request additional information from you to verify your identity or process your request, although you will not be required to create an account with us to

submit a request or have it fulfilled. We will require you to provide, at a minimum, your email address. We will also collect information that identifies your device when you submit a request, in order to help verify your identity.

- **Authorized Agent** – You may designate an authorized agent to make a CCPA request on your behalf by verifying your identity and providing the agent with written permission to make the request on your behalf.
- **Information about California resident requests in 2020**

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Request type	Requests received	Requests complied with	Requests denied	Mean number of days for response
Request to know	1	1	0	31 days
Request to delete	2	2	0	1 day

Request to **0** **0** **0**
opt out

The Nevada Angle:

- Although we do not currently conduct sales of personal information (covered by the relevant Nevada law), Nevada residents may submit a request directing us to not sell personal information we maintain about them if our practices change in the future, by sending the request to the following email address: nevada-request@ironsrc.com.

Children

ironSource does not knowingly collect or maintain personal information collected online from children under the age of 13, except to the extent that the U.S. Children’s Online Privacy Protection Act permits us to collect and maintain such information without parental consent. If you believe your child has provided us with personal information that is covered by the U.S. Children’s Online Privacy Protection Act without your required consent, please contact us at legal@ironsrc.com and we will make reasonable efforts to delete the information from our records. Our services may link to other websites or mobile apps. Please be advised that we are not responsible for the privacy practices of such other websites or mobile apps as those may have different privacy policies and terms of use and are not associated with us. You agree that we cannot control these websites and/or mobile apps and we shall not be responsible for any use of such websites and/or mobile apps.

The GDPR Angle:

- We do not collect or otherwise process personal data from individuals in the European Economic Area, the United Kingdom, and Switzerland whom we know to be under 16 years of age, except to comply with law or to support our

legitimate interests or the legitimate interests of our app developers as described above.

The CCPA Angle:

- We do not sell the personal information of minors under 16 years of age.

International Transfers

We store information that we collect from your device on our Amazon Web Services servers in the United States. Accordingly, please note that if you do not live in the United States, we will transfer your information to and store it in, the United States.

The GDPR Angle:

ironSource Mobile Ltd. is based in Israel, which is considered by the European Commission to be offering an adequate level of protection for the Personal Information of EU Member State residents.

We will transfer your information to third parties located outside of the European Economic Area, the United Kingdom, or Switzerland based on standard contractual clauses.

Representation for data subjects in the EU

We value your privacy and your rights as a data subject and have therefore appointed Prighter as our privacy representative and your point of contact.

Prighter gives you an easy way to exercise your privacy-related rights (e.g. requests to access or erase personal data). If you want to contact us via our representative Prighter or make use of your data subject rights, please visit the following <https://prighter.com/q/13822340265>.

Changes to This Privacy Policy

We may revise this Privacy Policy from time to time. The most current version of the policy will govern our processing of your information and is posted at <https://developers.is.com/ironsource-mobile/air/ironsource-mobile-privacy-policy/>. If we make a change to this policy that, in our sole discretion, is material, we will notify you via a banner on this website and by posting the revised Privacy Policy. By continuing to access or use an app containing our services after those changes become effective, you agree to be bound by the revised Privacy Policy.

Contact Us

ironSource Mobile Ltd.

dpo@ironsrc.com

121 Menachem Begin Rd., Tel Aviv, Israel

Attn: Data Protection Officer

You can also contact Lucky Boy games at any time:

luckyboygames123@gmail.com