

# Privacy Policy Ayga

# AYGA

## Privacy Policy

Last updated: 9th September 2025

*This privacy policy has been updated.*

We (the people behind the Ayga team and legal entity AYGA D.O.O.E.L) are committed to protecting any data that we collect concerning you (the User). By using our services you agree to the use of the data that we collect in accordance with this Privacy Policy.

This privacy policy sets out how we collect, store, process, transfer, share and use data that identifies or is associated with you or your child ("personal information").

Before accessing or using any of our Apps and Services, please ensure you have read and understood this privacy policy.

### Changes to this Policy

Any changes to our Privacy Policy will be placed here and will supersede this version of our Policy. We will take reasonable steps to draw your attention to any changes in our Policy. However, to be on the safe side, we suggest that you read this document each time you use the app to ensure that it still meets with your approval.

You are bound by any changes to the privacy policy when you use our Apps after such changes have been first posted. If we make a material change to this privacy policy and we have your contact details, we will contact you to inform you of the changes before we make them and allow you to opt out.

### We are committed to protecting your (child's) privacy

We collect the minimum amount of information about you that is commensurate with providing you with a satisfactory service. This Policy indicates the type of processes that may result in data being collected about you.

We work with a number of third party providers of certain products or services operating on our behalf, such as tracking services, analytics services etc. ("Third Parties") may passively collect

and maintain information about Users. Such Third Parties are carefully selected to ensure compliance with applicable privacy laws, and we confirm that they are compliant with the US Children's Online Privacy Protection Act of 1998, and the rules promulgated by the Federal Trade Commission (FTC) under that Act, including but not limited to the Children's Online Privacy Protection Rule 16 C.F.R. Part 312) ("COPPA"), this Privacy Policy and the rules, policies and guidelines of the applicable Platform Provider (such as Google) in performance of their services.

For more information on these, please see Annex below.

## **Which information may be processed from Users of our Ayga Apps?**

There are two types of information which may be processed about Users of our App:

1. Non-personal Information. Non-identifiable and anonymous information ("**Non-personal Information**") may be collected, stored and/or processed by us and/or third party providers of certain products and services, such as ad networks, analytics, etc. ("Third Party(ies)"). We and our Third Parties do not know the identity of the User from whom Non-personal Information has been collected. Non-personal Information is any information which is available to us and/or our Third Parties through use by Users of the App.

2. Personal Information. Individually identifiable information ("**Personal Information**"). This information may identify an individual and/or may be of a private and/or sensitive nature.

**We may collect Personal Information about you and your child only in case you provide it to us voluntarily.**

That may be a case when you submit information directly to us corresponding by phone, e-mail or otherwise, subscribe to our mailing lists, newsletters or other forms of marketing communications, respond to a survey, enter a promotion or use some other feature of the Apps and Service.

We may anonymize and aggregate any of the personal information we collect (so that it does not directly identify you or your child). We may use anonymized information for purposes that include testing our IT systems, research, data analysis, improving the Apps and Service and developing new products and features. We may also share such anonymized information with others.

## How is the Information about Our Users collected?

1. Non-personal Information may be collected through your use of the Ayga Apps. In other words, when you are using an Ayga App, we and our Third Parties are aware of it and may gather information relating to such usage, through the Ayga Apps, APIs or SDKs embedded in our Apps. In addition, local Non-personal Information may also be stored on your device via generally accepted industry technologies used within the Ayga Apps, such as “cookies” and local storage.
2. Personal Information which you provide us directly and/or through Third Parties via your installation and/or use of the Ayga Apps or your behavior to ads inside such Apps. This information is collected via the Ayga Apps or such Third Parties’ APIs or SDKs embedded in our Ayga Apps. In addition, local Personal Information may also be stored on your device via generally accepted industry technologies used within the Ayga Apps, such as “cookies” and local storage.
3. We process personal information on the basis of consent (when you sign in to the app or subscribe to newsletters), legitimate interests (analytics to improve services), and legal obligations (retaining transaction records). In our apps that comply with Children’s Online Privacy Protection Rule, we implement Parent Gate for their data protection.
4. We retain personal data only as long as necessary to provide our services, comply with legal obligations, resolve disputes, and enforce agreements.

## Children’s Data

We take the protection of children’s privacy very seriously. Some of our apps are designed for children, while others are intended for a general audience.

United States (COPPA compliance): For apps directed to children under 13, we comply with the Children’s Online Privacy Protection Act (COPPA). We implement mechanisms such as Parent Gates to help ensure that personal information is not collected from children without verifiable parental consent.

European Union and similar jurisdictions: For users located in the EU, the United Kingdom, or jurisdictions with similar rules, we do not knowingly collect personal information from children under the age of 16 (or the lower age limit set by local law, but never below 13) without the consent of a parent or legal guardian.

Parental rights: If you are a parent or guardian and believe that your child has provided personal information without your consent, please contact us at [contact@ayga.io](mailto:contact@ayga.io). We will take steps to delete the information promptly.

## Disclosing Information

We shall never provide personal information about you to other parties, except when we have your permission, or under the following specific and extreme circumstances:

- When our app is subject to court orders, subpoenas, or any other official legal process. Your information could be used to exercise our legal rights or defend against legal claims.
- When we suspect that user actions are in favor of illegal activities, or situations showing potential threat to the physical or mental safety of any person, or as otherwise required by law.
- In case our app gets acquired or merged with another company, information about you shall be transferred, and you will be subject to other Privacy Policy. However, we shall notify you prior to such an event.

Personal Information about you will be accessible to specific employees who will be assisting you and providing you with better user experience. Note that our employees will be subject to disciplinary actions, including termination of employment and/or criminal prosecution, if they fail to meet the obligations to which they are bound while working with us. On the other hand, we shall use information about user activity in order to provide statistics to other people or other companies, but such information shall never enclose any mentioning of personal identity.

## Your Rights In Respect Of Your Personal Information

If you reside in the European Union or a jurisdiction with similar privacy laws, you enjoy the following rights in respect of your personal information that we hold:

- **Right of access.** The right to obtain access to your personal information.
- **Right to rectification.** The right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete.
- **Right to erasure.** The right to obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.
- **Right to restriction.** The right to obtain the restriction of the processing undertaken by us on your personal information in certain circumstances, such as where the accuracy of the personal information is contested by you, for a period enabling us to verify the accuracy of that personal information.
- **Right to data portability.** The right to receive the personal information you have provided to us in a structured, commonly used, and machine-readable format, and to transmit that information to another controller, where technically feasible.
- **Right to object.** The right to object at any time to the processing of your personal information for reasons relating to your particular situation, including when we process your data for

analytics or on the basis of our legitimate interests. If you object, we will stop processing your personal information unless we have compelling legitimate grounds to continue.

- **Right not to be subject to automated decision-making.** The right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you. We do not carry out such automated decision-making in our apps, but if this changes, we will update this privacy policy accordingly. If you wish to exercise one of these rights, please contact us using the contact details at the end of this privacy policy.

## Advertisement

We **DO NOT** accept and show ADS from Third Party ad networks, and we **DO NOT** show any ADS using our internal system.

We may promote our Apps in Third Parties' applications and platforms.

## EU Representative (GDPR Article 27)

Our services are available globally, including to users in the European Union (EU). Under Article 27 of the General Data Protection Regulation (GDPR), non-EU organizations may be required to appoint an EU representative.

After reviewing our data processing activities, we believe that this requirement does not apply to us because:

Occasional processing – We do not actively target EU residents, and any personal data from EU users is collected only occasionally as a by-product of making our apps available worldwide.

No large-scale processing of sensitive data – We do not engage in large-scale processing of special categories of personal data (such as health, biometric, or political data) or data relating to criminal convictions.

Low risk to individuals' rights and freedoms – Our processing activities are minimal, limited to providing app functionality and analytics, and are unlikely to result in a risk to the rights and freedoms of natural persons in the EU.

For these reasons, we consider ourselves exempt from the obligation to appoint an EU representative under GDPR Article 27.

## Questions, Concerns, and Contacting Us

If you have any questions or concerns regarding this privacy policy, or if you want to know what information we have collected about you, please contact us. Send us a detailed message to [contact@ayga.io](mailto:contact@ayga.io), and we will try to resolve your concerns. You can also reach us at:

[contact@ayga.io](mailto:contact@ayga.io)

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## ANNEX – THIRD PARTIES

We process your and your child's data with carefully selected third parties to provide the best possible experience. You will find these listed below along with details of how they are used.

We do not sell or directly share your personal data with unrelated third parties. However, when using third-party SDKs (such as but not limited to: Unity, Firebase, Amplitude), some information (e.g., analytics, authentication data, crash reports) may be automatically collected and processed by those providers in accordance with their privacy policies.

### International Data Transfers

Some of the third-party services we use, such as but not limited to, Unity, Firebase and Amplitude, may process or store your personal information outside the European Economic Area (EEA). When personal data is transferred outside the EEA, we ensure that appropriate safeguards are in place to protect your information, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission, or
- Other legal mechanisms recognized under GDPR to ensure an adequate level of data protection.

By using our apps and services, you consent to the transfer of your personal information in accordance with this Privacy Policy and the applicable safeguards.

For more information on this, please email us at [contact@ayga.io](mailto:contact@ayga.io)

### Unity

We may use Unity Analytics service. For more details please refer to their [Privacy Policy](#).

### Firebase

We use Firebase services such as, but not limited to, Auth, Sign In With Google, Crashlytics, etc. For more details, please refer to their [Privacy Policy](#).

### Amplitude

is a cloud-based product-analytics platform that helps customers build better products. For more details please refer to their [Privacy Policy](#).