

# Privacy Policy

This Privacy Policy explains how your personal data is collected and processed by **YALP GAMES LLC** when you use the our mobile applications (the "App").

The App is a free to play game (with optional in-game-purchases), and in order to maintain the high quality and a great game experience we process information from and about you in particular to improve the entire experience in the App and to support internal operations.

We update this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, depending on the specific changes, we will provide you with additional notice or require a renewed consent.

## Collection of information

### Information we collect automatically through the app

When you access or use the App, we automatically collect general information about you, including:

- Log Information: We log information about your use of the App, including the type of device you use, the features you use, access times and your IP address.
- Device Information: We collect information about the device you use to access the App, including information about the device manufacture, device model, device's OS, time zone of device, language of device.
- Device identifiers: We collect online identifiers of the device you use to access the App, including IDFA, Google Ads ID, Google Device ID, Game Center ID, Google Play Account ID.
- Usage Information: We collect information relating to your use of the App, including your game progress, scores, achievements and interactions with other players.
- Consumption information: We collect information about your consumption habits relating to your use of the App, including which purchases you make with both virtual and real currencies and the reception of virtual goods in-game.

### Information we collect from other sources

If you log into the App using a third party site or platform such as Facebook, Apple Game Center and Google Sign-In, we access information about you from that site or platform, such as your screen name, profile information and friend lists, in accordance with the authorization procedures determined by such third party site or platform provided that you

have given the third party site in question such consent.

You can learn more about how such third-party sites or platforms process your personal data in the relevant privacy policy:

- Facebook: <https://www.facebook.com/about/privacy/>
- Game Center: <https://www.apple.com/legal/internet-services/itunes/gamecenter/>
- Google Play Games: <https://policies.google.com/privacy>

If you log into the App using a third party site or platform, you represent and warrant that (i) your access and use of such features in connection with the App will comply with the applicable terms and policies of such site or platform; and (ii) that you are over the minimum age limit that is prescribed for such third party site or platform by the legislation in the individual jurisdictions.

## Use of information – purpose and legal basis

We use information about you for the following purposes in accordance with the legal bases for each type of personal data as described below:

- Log-, device-, usage-, and consumption information and device identifiers are being processed:
  - to provide and deliver the products and services you request and send you related information as requested by you / as agreed with you;
  - to provide and maintain the App and the game experience; and
  - to send you technical notices, updates, security alerts, and support and administrative messages;  
*Our processing for the above purposes is necessary for the performance of a contract to which you are party in order to support the operation of the App, facilitate the delivery of requested products and services and enable maintenance and update of the App, see Article 6(1)(b) of the GDPR.*
  - to provide news and information about the App that we think will be of interest to you;
  - to personalize and improve the App and provide tailored content and features; ◦ to monitor and analyze trends, usage and activities in connection with the App;  
*Our processing for the above purposes is justified by our legitimate interests in providing advertisements and content of interest to you and improving our services in accordance with Article 6(1)(f) of the GDPR (also known as "the balancing-of-interest rule").*
  - to provide users that have given us consent to share their advertising IDs with

our ad network partners (as further specified under “Sharing of Information”) for the purpose of serving them with personalized advertisement in the App (behavioral advertising).

*Our processing for the above purpose is justified by our legitimate interests in providing advertisements and content of interest to you in accordance with Article 6(1)(f) of the GDPR. The disclosure of your advertising ID to third parties for the purposes of behavioral advertising is based on your consent in accordance with Article 6(1)(a) of the GDPR (see more below under Sharing of Information).*

- Information from other sources are being processed:

- to provide and deliver the products and services you request and send you related information;

*Our processing for the above purpose is necessary for the performance of a contract to which you are party in order to facilitate the delivery of requested products and services, see Section 6(1)(b) of the GDPR.*

- to link or combine information we get from others to help understand your needs and provide you with better service; and

- to provide news and information about the App we think will be of interest to you;

*Our processing for the above purposes is justified by our legitimate interests in providing content of interest to you and improving our services in accordance with Article 6(1)(f) of the GDPR (also known as "the balancing-of-interest rule").*

We only process your information to the extent that is necessary to achieve the purposes for which the information has been collected.

## Storage of information

YALP GAMES LLC will store your personal data for as long as necessary in order to provide you with the App or otherwise fulfil the purposes as described above, unless further storage is required in order to establish, exercise or defend a legal claim or to comply with applicable law, including accounting rules.

Your personal data are deleted or anonymized as soon as it no longer serves one of the above mentioned purposes and in any event no later than three (3) years after your interaction with YALP GAMES LLC has ceased.

## Sharing of information

We disclose information about you to the following categories of recipients based on the

legal bases under Sections 6(1)(b), 6(1)(c) and 6(1)(f) of the GDPR (see a description of the legal bases above):

- Social networks, see more under "Social Sharing features";
- Third parties if we are required to disclose your personal data by applicable law, rule, regulation, legal process or in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- The authorities if we believe your actions are inconsistent with the spirit or language of our policies or if the disclosure is necessary to protect the rights, property and safety of YALP GAMES LLC or others;
- Other players in order to provide certain in-app features, such as leaderboards, if you log into the App using a third-party service;

Furthermore, if you have given your consent in accordance with Section 6(1)(a) of the GDPR, we share your Device identifiers to advertising network companies for the purpose of them serving behavioral advertisements to you within the App. We use or may use the following advertising network companies:

- MoPub, Inc. <https://www.mopub.com/legal/privacy/>
- MoPub, Inc. Partners <https://www.mopub.com/legal/partners/>
- Facebook, Inc. <https://www.facebook.com/about/privacy/>
- Google LLC <https://policies.google.com/privacy>
- Unity Technologies <https://unity3d.com/legal/privacy-policy>
- IronSource  
<http://www.ironsrc.com/wp-content/uploads/2019/03/ironSource-Privacy-Policy.pdf>
- Applovin Corporation <https://www.applovin.com/privacy/>
- Vungle, Inc. <https://vungle.com/privacy/>
- ByteDance Ltd. (TikTok) <https://www.tiktok.com/legal/privacy-policy?lang=en>
- Amazon.com, Inc.  
[https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=468496&ref\\_=footer\\_privacy](https://www.amazon.com/gp/help/customer/display.html?ie=UTF8&nodeId=468496&ref_=footer_privacy)
- Fyber <https://www.fyber.com/privacy-policy/>
- MobFox US LLC <https://www.mobfox.com/privacy-policy>
- TapJoy, Inc <https://www.tapjoy.com/legal/advertisers/#privacy-policy>
- Snapchat (Snap Inc.) <https://www.snap.com/en-US/privacy/privacy-center/>
- Tencent Holding Ltd. <https://www.tencent.com/en-us/privacy-policy.html>

The recipients' use of the disclosed information will not be covered by this Privacy Policy. If you have questions concerning the processing carried out by such third parties, you should

review their privacy policy.

In connection with our processing, we use following data processors such as server hosting providers, technical service providers for supporting internal operations, user login services and analytics service providers:

- Tenjin, Inc. <https://www.tenjin.io/privacy>
- Facebook Analytics (Facebook, Inc.) <https://www.facebook.com/about/privacy/>
- Firebase (Google LLC) <https://firebase.google.com/support/privacy> • Appfigures <https://appfigures.com/privacy>

## Social sharing features

The App offers or can offer social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take in the App with other media. You must be over the minimum age limit that is prescribed by the legislation in the individual jurisdictions to use any social sharing features integrated in the App. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature.

## Children

Use of the App is limited to users aged 13 years and above, except in European Economic Area, where the App is limited to users aged 16 years and above. If you are accepting this Privacy Policy and using the App, you warrant you are 13 (or 16, depends what is applicable) or more years old.

If you have additional questions about YALP GAMES LLC's privacy practices related to children under the applicable minimum age, please contact us at [yalp.games.inc@gmail.com](mailto:yalp.games.inc@gmail.com).

## Transfer to third countries

In connection with the processing, we will in certain circumstances transfer your personal data to recipients outside the EEU.

We only transfer personal data to entities in third countries that have provided appropriate safeguards to ensure that their level of data protection is in agreement with this Privacy Policy and applicable law.

Consequently, the transfers will only occur based on the following safeguards:

- If the entity is certified to comply with the principles for data protection under the US-EU Privacy Shield Framework ("Privacy Shield") (you can view the entities certified under Privacy Shield at <https://www.privacyshield.gov/>), or
- If we have entered into standard data protection clauses adopted by the European Commission with the entity, which is deemed to offer sufficient safeguards with respect to the protection of the privacy and fundamental rights and freedoms of individuals.

## Security

YALP GAMES LLC takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

## Push notifications

We send push notifications or alerts to your mobile device to provide game-related information, service updates, promotional communications and other related messages, if you have agreed to such notifications. You can deactivate these notifications by changing your notification settings on your device.

## Does YALP GAMES LLC actually "sell" personal data?

YALP GAMES LLC does not, and will not, provide your personal data in direct exchange for money. Therefore, in the literal sense, YALP GAMES LLC does not sell your data. However, we have disclosed some categories of personal data we collect, explained under "Sharing of information", to the third parties for business purpose as explained under "Use of information – purpose and legal basis".

To the extent this practice is interpreted to constitute a "sale" under the CCPA, please contact us at [yalp.games.inc@gmail.com](mailto:yalp.games.inc@gmail.com) to exercise your right to withdraw your consent on sharing your personal data with third parties.

## YOUR RIGHTS

### Rights of EEU residents

We process and answer your requests without undue delay and in any event within one month of our receipt of the request unless a longer period is required due to the complexity of the request. In this case, our response time can be up to three months in total as permitted by Article 12 of the GDPR.

### Right to request access

You have the right to request access into the data that we are processing on you, see Article 15 of the GDPR, including information about:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed;
- the envisaged period for which the personal data will be stored.

Furthermore, you have the right to obtain a copy of the personal data undergoing processing. Please note that the access may be restricted due to intellectual property or trade secrets.

### The right to object

You have the right to object to our processing of your personal data on grounds relating to your particular situation when the data are processed based on the balancing-of- interest rule in Section 6(1)(f) of the GDPR, see Article 21 of the GDPR. In this case, we will cease the processing unless there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or if the processing is necessary for the establishment, exercise or defense of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes at any time. We will cease the processing of your personal data for this purpose after the objection.

### Right to rectification

You have the right to have inaccurate personal data rectified, see Article 16 of the GDPR.

### The right to restriction

You have the right to obtain restriction of processing in certain circumstances, see Article 18 of the GDPR. If you have the right to restriction, we will only process your data with your consent or for the establishment, exercise or defense of a legal claim or to protect a person or important grounds of public interest.

### The right to withdraw consent

If we have asked for your consent to our processing of your data, you have the right to withdraw your consent at any time, see Article 7 of the GDPR.

If you withdraw your consent, we will cease processing of the data for which you have withdrawn consent, unless we have a legal obligation to keep some or parts of your data.

The withdrawal of your consent does not affect the lawfulness of processing based on your consent before its withdrawal.

#### The right to data portability

You have the right to receive the personal data you have provided us with which we process in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller if the processing is based on consent or contract performance, see Article 20 of the GDPR.

#### Rights of California residents

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

#### Right to opt out

Under CCPA each California resident can request any business stops selling personal information to third parties.

#### Right to be informed

You have a right to be informed about what categories of personal data we are collecting, including the purpose of the collection. You can freely find this information in our Privacy Policy. We update our Privacy Policy at least once every 12 months.

#### Right to disclosure

You can request us to disclose what personal data we have collected on you in the past 12 months.

We can assure you that our Privacy Policy is an relevant document where you can find information about what personal data we have collected about you over the past 12 months



and intend to collect, sources of your personal data and how we use your personal data.

You also have a right to get a free copy of your personal information disclosed in a readily usable and readable format (right of access). You can make this request for free, twice per year.

When providing information under the right of access, we will provide you with the following information:

- The categories of personal data we are collecting about you,
- The categories of sources of the personal data,
- The purpose for collecting your personal data,
- The categories of any third parties with whom we share your personal data,
- The specific pieces of personal data collected about you.

#### Right to deletion

You can request us to delete the personal data we have collected on you in the past 12 months.

We fully recognize your right to deletion, however, we would like to note that in some cases we are obliged to keep your personal data for certain period of time. For instance, if we need to provide services to you, detect or resolve issues security or functionality-related issues, comply with the law, conduct research in the public interest, safeguard the right to free speech or carry out any actions for internal purposes that you might reasonably expect. If we do not have obligations to perform any of the above actions, we can delete your personal information at your request.

#### Data Deletion Request

You may request YALP GAMES LLC to erase without undue delay your personal data when it is no longer necessary for YALP GAMES LLC to retain such data.

In order for your data to be erased you can contact YALP GAMES LLC by [yalp.games.inc@gmail.com](mailto:yalp.games.inc@gmail.com) with request.

#### Right to equal services and prices

California residents are protected against any discrimination that a business might subject them to based on the exercising of their CCPA rights.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you the App,
- Charge you different prices or rates for the App, including through granting discounts or other benefits, or imposing penalties,
- Provide you a different level or quality of the App,
- Suggest that you may receive a different price or rate for services or a different level or quality of the App.

## How to exercise my rights

If you wish to use any of the rights described below, you may contact us at any time by emailing us at [yalp.games.inc@gmail.com](mailto:yalp.games.inc@gmail.com).

**Mandatory verification:** We will need to verify your identity before processing your request. However, because you cannot create an account with the App, and you do not provide us with any information directly, we only collect information automatically, we may use limited verification methods. To verify your identity, we will generally require the matching data in our systems to the information we can process when you are making a request. In certain circumstances, we may decline the request, mainly where we are unable to verify your identity, for example, if you disable cookies, changed the device you used to access the App or you already requested us to delete your personal data.

## Contact

YALP GAMES LLC has the following contact information:

YALP GAMES LLC

Address: Ukraine, Kyiv, 04071, bud. 51a vul. Vozdvyzhenska

E-mail: [yalp.games.inc@gmail.com](mailto:yalp.games.inc@gmail.com)

You may also contact your local data protection authority for unresolved complaints.