

IMPORTANT PRIVACY INFORMATION

If you use Keiki Kids Educational Games, we may automatically collect from your device language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, Facebook ID, and other unique identifiers (such as IDFA). We need this data to provide our services, analyze how our customers use the service, to measure ads.

For improving the app and serving ads, we use third party solutions. As a result, we may process data using solutions developed by **Amazon, Snapchat, Pinterest, Appsflyer, Amplitude, TikTok, Facebook, Google**. Therefore, some of the data is stored and processed on the servers of such third parties. This enables us to (1) analyze different interactions (how often users make purchases); (2) serve and measure ads (and show them only to a particular group of users, for example, only to subscribers). Please read our Privacy Policy below to know more about what we do with data (Section 2), what data privacy rights are available to you (Section 5) and who will be the data controller (Section 12). If any questions will remain unanswered, please contact us at support@keiki.app.

KEIKI KIDS EDUCATIONAL GAMES

PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you or your child use the Keiki Kids Educational Games mobile application (the “**App**”), and the services provided through it (together with the App, the “**Service**”), how such personal data will be used, shared.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU AND TO PROVIDE A VERIFIABLE PARENTAL CONSENT) AND (III) YOU ARE A PARENT OR A LEGAL GUARDIAN, IF YOU USE OUR SERVICES ON BEHALF OF A CHILD. If you do not agree, or are unable to make this promise, you must not use the Service. In such case, you must (a) contact us and request deletion of your/your child’s data; (b) delete the App from your devices; (c) cancel any subscriptions using the functionality provided by Apple (if you are using iOS) or Google (if you are using Android), any other app stores that may be available from time to time.

“**COPPA**” means Children's Online Privacy Protection Act of 1998.

“**GDPR**” means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“**EEA**” includes all current member states to the European Union and the European Economic Area. For the purpose of this policy EEA shall include the United Kingdom of Great Britain and Northern Ireland.

“**Process**”, in respect of personal data, includes to collect, store, and disclose to others.

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1. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, when you contact our support, you may enter your email). We also collect data automatically (for example, your IP address).

1.1. Data you give us

We may ask you to provide, for example, an email address if you wish to contact us for any inquiries.

1.2. Data we collect automatically:

1.2.1. Data about how you found us

We collect data about your referring app or URL (that is, the app or place on the Web where you were when you tapped on our ad).

1.2.2. Device and Location data.

We collect data from your mobile device. Examples of such data include: language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Facebook ID.

1.2.3. Usage data

We record how you interact with our Service. For example, we log your taps on certain areas of the interface, the features, and content you interact with, how often you use the Service, how long you are in the Service, and your subscription orders.

1.2.4. Advertising IDs

We collect your Apple Identifier for Advertising (“IDFA”), Identifier for Vendors (“IDFV”), or Google Advertising ID (“AAID”) (depending on the operating system of your device). You can typically reset these numbers or ask apps not to track you through the settings of your device’s operating system (but we do not control this).

2. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

2.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.

To host personal data and enable this Service to operate and be distributed we use **Amazon Web Services (AWS)**, which is a hosting and backend service provided by Amazon.

To monitor infrastructure and the App’s performance, we use **Crashlytics**, which is a monitoring service provided by Google. Here’s its [Data Collection Policy](#).

2.2. To customize your experience

We process your personal data, such as actions with App, to adjust the content of the Service and make offers tailored to your personal preferences.

2.3. To provide you with customer support

We process your personal data to respond to your requests for technical support, Service information or to any other communication you initiate. For this purpose, we may send you, for example, notifications about the performance of our Service, security, payment transactions, notices regarding our Terms and Conditions of Use or this Privacy Policy.

2.4. To communicate with you regarding your use of our Service

We communicate with you, for example, by push notifications, if you opt in. These may include information on certain Service updates, or other information about the Service To opt out of receiving push notifications, you need to change the settings on your device.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by our users, as well as when they interacted with it, such as by clicking on links included in the message.

We use **Apple Push Notification** service (“APNs”), that is a notifications service provided by Apple. APNs allows us to send information to iOS devices. Apple’s [privacy policy](#).

To communicate with you we also use **Firebase Cloud Messaging** and **Firebase Notifications**, which are message sending services provided by Google. Firebase Cloud Messaging allows us to send messages and notifications to users of our App across platforms such as Android and iOS. Google’s [privacy policy](#).

2.5. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the Service and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand

what features of the Service our users like more. As a consequence, we often decide how to improve the Service based on the results obtained from this processing. For example, if we discover that users more often engage in specific area or activity type, we may develop and introduce similar features into the Service.

To perform research and analysis about how users interact with our Service we use **Appsflyer**. Appsflyer enables us to understand, in particular, how users find us (for example, who was the advertiser that delivered an ad to users, which led you to an app store with our App). Appsflyer also provides us with different analytics tools that enable us to research and analyze your use of the Service. [Privacy Policy](#), [Opt Out](#).

We also use **Amplitude**, which is an analytics service provided by Amplitude Inc. We use this tool to understand how customers use our Service. Amplitude collects various technical information, in particular, time zone, type of device (phone or tablet), unique identifiers (such as IDFA). Amplitude also allows us to track various interactions (entering your reading goals) that occur on the App. As a result, Amplitude helps us to decide what features should we focus on. Amplitude provides more information on how they process data in its [Privacy Policy](#).

We also use **Firebase Analytics**, which is an analytics service provided by Google. In order to understand Google's use of data, consult Google's [partner policy](#). Firebase [Privacy information](#). [Google's Privacy Policy](#).

To track and analyze behavior of our App's users (in particular, how they react to changes of the App structure, text or any other component), we use **Firebase Remote Config**. Firebase Remote Config is an A/B testing and configuration service provided by Google, which also enables us to tailor the content that our App's users see (for example, it allows us to show different onboarding screens to different users). [Privacy Policy](#) and [Privacy and Security in Firebase](#).

We use **Facebook Analytics**, which is a service provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, in particular, aggregated demographics and insights on how many people access the Service and users' interactions within the Service. Lean more about Facebook's approach from its [Privacy Policy](#).

2.6. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our Terms and Conditions of Use).

2.7. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

3. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA (Applies only to EEA-based users)

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 2.

We process your personal data under the following legal bases:

3.1. consent

3.2. to perform our contract with you;

Under this legal basis we:

- Provide our Service (in accordance with our Terms and Conditions of Use)
- Customize your experience
- Provide you with customer support
- Communicate with you regarding your use of our Service
- Process your payments

3.3. for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of the Service easier and more enjoyable, or to introduce and test new features).

- to enforce our Terms and Conditions of Use and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Service, non-compliance with our Terms and Conditions of Use.

3.4. to comply with legal obligations.

4. WITH WHOM WE MAY SHARE YOUR PERSONAL DATA

We may share information with third parties that are needed to support the Service or when we are legally required to do so. We may share some sets of personal data, in particular, for purposes indicated in Section 2 of this Privacy Policy. The types of third parties we may share information with include, in particular:

4.1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We may share your personal information with the following types of service providers:

- push notifications delivery services (Apple)
- analytics services (Appsflyer, Google, Facebook)
- advertising networks (Facebook, Google, Snapchat, TikTok, Pinterest)
- cloud storage (Amazon)

4.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our Terms and Conditions of Use, to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

4.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

5. HOW YOU CAN EXERCISE YOUR RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided on the App.

Deleting your personal data. You can request erasure of your personal data as permitted by law.

When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases, we may be legally required to keep some of the data for a certain time; in such event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use thereof.

Additional information for EEA-based users:

If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can send respective request to us as described below.

To exercise any of your privacy rights, please send a request to support@keiki.app.

6. AGE LIMITATION

We do not knowingly collect, maintain, or use personal information from children under 16 years old without their parent's/legal guardian's permission. If you learn that your child has provided us with personal information without your consent, please contact us at support@keiki.app.

7. INTERNATIONAL DATA TRANSFERS

We do business globally. We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have

the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available [here](#)), or (ii) the European Commission adequacy decisions about certain countries (details available [here](#)).

8. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Service or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

9. CALIFORNIA PRIVACY RIGHTS

California's Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties' direct marketing purposes. Learn more about what is considered to be [personal information under the statute](#).

To obtain this information from us, please send an email message to support@keiki.app which includes "Request for California Privacy Information" on the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

10. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you). We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

11. HOW "DO NOT TRACK" REQUESTS ARE HANDLED

Except as otherwise stipulated in this Privacy Policy, this Service does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

12. PERSONAL DATA CONTROLLER

BENIPOL LIMITED, a company duly incorporated and validly existing under the laws of Cyprus, having its registered office at Florinis 7, Greg Tower, 2nd Floor, 1065, Nicosia, Cyprus, will be the controller of your personal data.

13. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at support@keiki.app.

Effective as of: 31 March 2021