IMPORTANT PRIVACY INFORMATION

If you use Kids Jigsaw Puzzle Game mobile application, 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 our Service, we may share this data with third parties. Such parties include **Snapchat, Pinterest, Appsflyer, Amplitude, TikTok, Facebook, Google.** As a result of sharing this data with third parties we (1) analyze different interactions (what products our users have viewed); (2) measure ads.

If you decide to make a purchase on the Service, we will ask you to provide your email – we will use it to send your purchase.

Please read our Privacy Policy below to know more about what we do with data (Section 3), what data privacy rights are available to you (Section 6) and who will be the data controller (Section 1). If any questions will remain unanswered, please contact us at support@kids-learning.today.

By tapping "Accept" button below you explicitly agree to the Terms and Conditions of Use, Privacy Policy (in particular, to sending data to the third parties, as described in the Privacy Policy).

KIDS JIGSAW PUZZLE GAME

PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you or your child use the Kids Jigsaw Puzzle Game 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 (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) delete your/your child's account using the functionality found in "Settings" in the App, or contact us and request deletion of your/your child's data; and (b) delete the App from your devices.

“**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.

“**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, your 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 through the settings of your device’s operating system (but we do not control this).

1. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

1.1. 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.

1.2. 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.

1.3. 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.

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

We communicate with you, for example, by push notifications or emails. 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. You can also opt-out of receiving emails using unsubscribe link found in the footer of our emails.

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.

1.5. 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 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.

1.6. To personalize our ads

We and our partners use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you have installed our App, you might see ads of our products in your Facebook's feed.

How to opt out or influence personalized advertising
iOS: On your iPhone or iPad, go to Settings > Privacy > Apple Advertising and deselect Personalized Ads.

Android: To opt-out of ads on an Android device, go to Settings > Privacy > Ads and enable Opt out of Ads personalization. In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads). To learn even more about how to affect advertising choices on various devices, please look at the information available here.

In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- Network Advertising Initiative – http://optout.networkadvertising.org/
- Digital Advertising Alliance – http://optout.aboutads.info/
- Digital Advertising Alliance (Canada) – http://youradchoices.ca/choices
- Digital Advertising Alliance (EU) – http://www.youronlinechoices.com/

- DAA AppChoices page – http://www.aboutads.info/appchoices

We value your right to influence the ads that you see, thus we are letting you know what service providers we use for this purpose and how some of them allow you to control your ad preferences.

We use **Facebook Ads Manager** together with **Facebook Custom Audience**, which allows us to choose audiences that will see our ads on Facebook or other Facebook's products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the Service (for example, installed the App). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook's products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience here.

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go here or adjust your ads settings on Facebook.

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our App (for example, show our ads to users who have made a purchase). Some other examples of events that may be used for tailoring ads include, in particular, installing our App. Google allows its users to opt out of Google's personalized ads and to prevent their data from being used by Google Analytics.

We also use **Snapchat Advertising Platform** together with **Snapchat Audience Based Match**, which is an ad delivery service provided by Snapchat that can link the activity of some users of our App with the Snapchat advertising network and show some of our ads to them. As a result, you may see more of ads on Snapchat in case you use our App. Snapchat allows you to Opt Out of their audience based ads. Privacy Policy.

TikTok Ads is the service provided by TikTok that can deliver ads to its users. The ads can be tailored to specific categories of users (for instance, based on their geographical location). TikTok's Privacy Policy.

We use **Pinterest Ads** to deliver group-based advertisements. For example, you may see our ads if you are interested in specific services, information, or offers. Pinterest Privacy Policy.

1.7. 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).

1.8. 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.

1. 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:

1.1. 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

1.2. 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 communicate with you regarding your use of our Service

This includes, for example, sending you email to notify you that we have released a new product or sending you push notifications reminding to finish game. The legitimate interest we rely on for this purpose is our interest to encourage you to use our Service more often.

- 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.

1.3. to comply with legal obligations.

2. 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.

0. 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 to us in the profile section of the App.

You may also request a copy of your personal data collected during your use of the Service at support@kids-learning.today.

Deleting your personal data. You can request erasure of your personal data by sending us an email at support@kids-learning.today.

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 by requesting its erasure as described above or sending a request at support@kids-learning.today.

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 a 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 do so by requesting it at support@kids-learning.today.

0. 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 ssupport@kids-learning.today.

0. 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).

0. 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.

0. 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@kids-learning.today 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.

0. 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.

0. 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.

0. PERSONAL DATA CONTROLLER

SPEKADOL 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.

0. 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@kids-learning.today.

Effective as of: 17 May 2021