### CHILDREN'S PRIVACY POLICY

Effective: 10<sup>TH</sup> December 2020

SifoTech. ("SifoTech," "we," "our" or "us") is dedicated to protecting the privacy rights of our users.

### 1. CHILDREN UNDER THE AGE OF 13 YEARS OLD

If you are under the age of 13 years old and intent to have access or play our games designed for Families, you have to pay attention on this Privacy Policy. SifoTech is committed to protecting the privacy of children who use our sites and applications. This online child privacy policy explains our parental consent, information gathering, and disclosure practices provided by children under 13 ("child" or "children") and uses terms set out in our general privacy policy.

We believe Children need particular protection when you are collecting and processing their personal data because they may be less aware of the risks involved.

This Children's Online Privacy Policy explains our information collection, disclosure, and parental consent practices with respect to information provided by children under the age of 13 ("child" or "children"), and uses terms that are defined in our **general Privacy Policy**. This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), the California On Line Privacy Protection Act (CalOPPA) and outlines our practices in the United States, Latin America and Europe (GDPR) regarding children's personal information. For more information about COPPA and general tips about protecting children's online privacy, please visit our site.

This Privacy Policy governs the use of SifoTech' Services by children's who are under thirteen (13) years old and younger. However, if you intent to know about the other general rules, we recommend you to check our General Privacy Policy, since you have access to all Information regarding: a) Types of Information we collect; b) how we collect your Information; c) use of your Information by SifoTech and Third Parties; d) your control and choices, among others.

We are available to clarify any doubt through our communication's channels.

# 2. TERMS AND CONDITONS

information from children.

SifoTech provides application games for children. Children have access to its games, but the apps do not collect information from them.

Therefore, SifoTech does not condition a children's participation on the disclosure of Information, as well as we do not directly collect and store any

Some information may nonetheless be collected through and maintained by SifoTech's third-party providers of certain products or services, such as Ad Networks, Analytics Providers, etc... You, as a parent or legal guardian of a Kid, can find a full list of such third-party providers in Section 4. However, for children's directed games all of our third parties are set with COPPA compliant policies, so they will not also collect information that is not allowed under COPPA.

We do not use any codices in our applications.

## 2.1 Information Collected About Children

SifoTech does not collect personal contact information (eg. full name, email address, home address, or phone number) or any geolocation information from children under the age of 13. We may collect information that is reasonably necessary to support ten internal operations.

Children's non-Personal Information collected by SifoTech and its Partners may include the following technical information: type of operation system (e.g. Android, iOS, etc.), type of browser (e.g. Explorer, Firefox, Chrome, Safari, etc.), screen resolution (e.g.  $800 \times 600$ ,  $1024 \times 768$ , etc.), language (e.g. English), device type (e.g. Galaxy, HTC, iPhone, etc.) and only general location may be collected, no street name or city/town name is collected.

This data is principally used for internal purposes only, in order to: Provide children with access to features and activities on our site and applications:

Customize content and improve our sites and applications;

Conduct research and analysis to address the performance of our sites and applications

Generate anonymous reporting for use by SifoTech.

In the event we collect (or allow others to collect) such information from children on our sites and applications for other purposes, we will notify parents and obtain consent prior to such collection.

We strive to ensure that all of our Partners adhere to the same standards for the collection and usage of your Information as we do, and we recommend to check the Children's Partner Policy of our Partners before using the services, in order to verify the accomplish with COPPA as we do.

SifoTech does not allow any Personal Information to be linked to a child's Persistent Identifier.

We will not require a child to provide more information than is reasonably necessary in order to participate in an online activity.

In any instance that we collect information from a child, we will retain that information only so long as reasonably necessary to fulfill the activity request or allow the child to continue to participate in the activity, and ensure the security of our users and our services, or as required by law. In the event we discover we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either delete the information or immediately seek the parent's consent for that collection.

Please contact us at esyehia@yahoo.com if you have any reason to suspect that SifoTech has collected Personal Information from children. Upon notification, we will investigate promptly and if it turns out to be accurate, we will than delete the improper Personal Information as quickly as possible.

SifoTech Children's Policy is in accordance with GDPR, taking into account that, in our Children's Privacy Policy, we are following these procedures:

- Any information and communication, where processing is addressed to a child, should be in such a clear and plain language that the child can easily understand.
- The consent of the holder of parental responsibility should not be necessary just in the context of preventive or counselling services offered directly to a child.

- Take appropriate measures to provide any information referred to in <u>Articles 13</u> and <u>14</u> and any communication under <u>Articles 15</u> to <u>22</u> and <u>34</u> relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language, in particular for any information addressed specifically to a children
- Children merit specific protection with regard to their personal data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of personal data

In addition, Tapps also follows the CalOPPA – California Privacy Rights and, the California Civil Code Section 1798.83 permits our Users who are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. California residents have the right to receive:

- a) information identifying any third-party company(ies) to whom SifoTech may have disclosed (within the previous calendar year) Personal Information pertaining to You and your family for that company's direct marketing purposes; and
- b) a description of the categories of Personal Information disclosed.

We may disclose information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information collected from children (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our sites, applications, and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

At any time, parents can refuse to permit us to collect further information from their children in association with a particular account and can request that we delete from our records the information we have collected in connection with that account. Please keep in mind that a request to delete records may lead to a termination of service.

# 3. CONTACT US

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please send an e-mail to esyehia@yahoo.com **SifoTech.**