Niantic Privacy Policy

Effective as of: July 15, 2024

We are Niantic. We provide real-world augmented reality platforms, designed to enable you to interact in shared worlds, seamlessly blended with the real world. To do that, we need information about you. Protecting your privacy is really important to us. We only use your information where we have a legal basis to do so. This Privacy Policy will help you understand what information we collect, how we use it and what choices you have when you play any of our games or use any of our apps, use our websites, buy merchandise from us, or take part in live events and promotions (the "Services").

Our Privacy Policy is designed to give you a comprehensive understanding of the steps that we take to protect the personal information that you share with us, and we would always recommend that you read it in full. Younger players, however, may wish to check out our 'Privacy Explorers' page for an overview of the key points in this policy.

You should also read our Terms of Service which set out the contract between you and Niantic when you use our Services.

1. Who decides how your information is used?

Niantic, Inc. (1 Ferry Building Suite 200, San Francisco, CA 94111) generally is the data controller responsible for making decisions about how we use your personal information. If however you are based in the United Kingdom (UK), Switzerland or the European Economic Area (EEA), your data controller is Niantic International Limited in the UK (11th Floor Whitefriars, Lewins Mead, Bristol, United Kingdom, BS1 2NT).

If you have any questions or comments on this policy, you can:

- Email us at privacy@nianticlabs.com
- Contact our Data Protection Officer at dpo@nianticlabs.com

2. The information we collect about you and how we use it

This Privacy Policy covers our use of any information that can or could be used to identify you or is linked or reasonably linkable to you ("Personal Data").

We need to collect and use certain Personal Data to provide the Services to you and fulfill the promises we make to you in the Terms of Service:

- Some of our Services require you to register with us or sign up for an account before you can use them. Where this is the case, you provide us with information including your age and the in-app username that you choose to use on our Services. We collect and use this information in order to authenticate you when you register an account and use the Services, to make sure you are eligible and able to receive the Services, and so that you receive the correct version of the Services.
- You may be required to have an account with a supported external single sign-on service in order to use some of our Services. Where this is the case, the Personal Data we collect also depends on which external accounts you choose to use, their privacy policy, and what your privacy settings with those services allow us to see when you use their services to access Niantic Services.
  - If you choose to link your Google account to the Services, we will collect your Google email address and an authentication token provided by Google.
  - If you choose to link your Facebook account to the Services, we will collect a unique user ID provided by Facebook and, if permitted by you, your Facebook registered email address.
  - If you choose to link your Apple account to the Services, we will collect your email address on file with your Apple ID account or a private relayed email address if you use the Hide My Email option provided by Apple.
  - If you choose to link your Pokémon Trainer Club ("PTC") account administered by The Pokémon Company International ("TPCI") to participating Services, we will collect from TPCI your PTC registered email address, your PTC username, your PTC date of birth, and a unique PTC user ID. If you are registering your PTC account on behalf of your

authorized child we will also collect some Personal Data about your child. See Section 8 ("Children") for more information.

- If you choose to link your Nintendo account to participating Services, we will collect a unique user ID provided by Nintendo and your email address on file with your Nintendo account (if available). You may also choose to import your Mii avatar into certain Services. If you are registering a Nintendo account on behalf of your authorized child we will also collect some Personal Data about your child. See Section 8 ("Children") for more information.

- Depending on the particular Service you sign up for, we may support other external single sign-on services and collect additional Personal Data from them. Some external providers may notify you that they make additional information, such as your public profile, available to us when you use their single sign-on services. We do not collect that information from them.

- If you elect to use your Niantic Profile in connection with a third-party developer service (a "Connected Service"), we may collect the Personal Data outlined above.

- We collect and use your device location information as you use our Services (and, if you elect to turn on background location tracking for participating Services, while you are not directly interacting with these Services), including how you move around and events that occur during in-app activity or gameplay. Our Services include location-based games whose core feature is to provide an experience tied to your real-world location, so we need to know where you are to operate these apps and games for you, and to plan the location of in-game or in-app resources (for example PokéStops within Pokémon GO). We identify your location using a variety of technologies, including GPS, the WiFi points you are accessing the Service through and mobile/cell tower triangulation.

- We also collect and use your in-game or in-app actions and achievements, as well as certain information about your mobile device (including device identifiers, device OS, model, configuration, settings, and information about third-party applications or software installed on your device), to operate the Services for you and to personalize your gameplay and user experience. We will also generate an internal account ID when you use certain Services to associate you with an account.

- We also use the information above to show in-game sponsored locations that are in your vicinity as part of the gameplay experience.

- We further use the information above in order to provide technical and customer support to you.

- You also give us Personal Data when you make a purchase through us, subscribe to our publications, register for a live event, enter a competition, promotion, sweepstakes or survey or communicate with us. Depending on which of these Services you use, that may include your name, mailing address, phone number, country of residency, age, and email address. We use that information to fulfill those Services to you and to provide related customer support to you and to perform system maintenance and debugging
- Our games and apps include innovative features which allow you and other players to view and interact with the same virtual objects at the same time in a shared physical space. They also allow you to leave persistent virtual objects at real-world locations, so other players can see them even when you are not there, and so you can see them when you return. In order to provide you with these AR experiences, Niantic needs to collect geospatial data and images from your device camera and sensors during your AR experiences. Please see our Help Center for more information on AR experiences and Privacy.

In addition, we have and rely on a legitimate interest in using your Personal Data as follows:

- Using your IP address, browser type, operating system, the web page you were visiting before accessing our Services, the pages of our Services which you browsed or the features you used, and the time spent on those pages or features, the links on our Services that you click on, device and advertising identifiers, age, as well as actions you take during gameplay, your in-app user settings, preferences (including avatar characteristics), and your in-app purchases to learn about our users, and understand who is using our Services and how.
- Using your contact information, namely your email address in order to communicate with you to provide technical and customer support.
- Using your internal account ID and in-game username in order to attribute to your account any user content (such as local points of interest) that you elect to submit to Niantic through the Services. You can choose to opt out of having your in-game username attributed on your Wayfarer submissions across Niantic products by going to the Niantic Wayfarer settings.
- Using your email address and device information in order to share updates and news with you either within the apps or by email. You can unsubscribe from these at any time in your device settings or in-app settings.

- Analyzing your in-game actions and achievements to show you rewards, promotions, or other offers about our Services that are tailored to your personal user experience. You can choose to opt out of this and certain other processing of your Personal Data by following the steps described in Section 7 ("Your rights and choices").
- To show advertising to our users, including advertising promoting Niantic apps shown on other websites and online services, and ads (typically in the form of sponsored gifts) in our apps. You can choose to opt out of receiving these sponsored gifts by visiting the in-app settings. You can choose to opt out of personalized advertisements by visiting the settings on your device and turning off "Allow Apps to Request to Track" or activating "Limit Ad Tracking" on Apple devices, or activating "Opt-out of Interest Based Ads" on Android devices.
- We collect content you contribute such as images, text, and/or video to provide social features within our games and apps so you can interact and play with other players, including storing and displaying your communications, content, and other information shared with those players, finding your friends and being found by them, including through imported contacts, and sharing your gameplay or in-app experience and achievements with your friends or other players. You can visit your Niantic Profile or in-app settings for opt-out options. If you elect to contribute routes, or share images or scans of real-world public places on our services with associated location information, we may use that information to improve our products and services, but only after anonymizing the information through various means, including blurring. We use a mix of automated and manual review to detect and moderate content you contribute to our Services to protect Niantic, or to protect the rights and safety of others.
- To improve the features that we offer you through the Services, or to provide you with new or additional features for our Services.
- To organize and run live events based on or featuring our games. Note that when you participate in live events your in-game actions and achievements, in-game username and your avatar, team, and other components of your in-game profile will be visible to other event participants and to the public (for example on leaderboards displayed at the event and online).
- Using your in-app actions and achievements, transactions, as well as certain information about your mobile device (including device identifiers, device OS, model, configuration, settings, and information about third-party applications or software installed on your device), to carry out anti-fraud and anti-cheating measures against behaviors prohibited under our Terms of Service, to prevent abuse, and to provide a fair gaming experience to all players.

- To make legal or regulatory disclosures and to establish, exercise, or defend legal claims.
- We're passionate about AR and make our technology available through the Niantic Lightship platform to other developers who feel the same so that they too can create and publish exciting AR experiences for you to enjoy. If you use such a third-party game or app powered by Lightship, we have a legitimate interest in collecting and using the Personal Data described above in order to operate the AR features in these games and apps. This includes your location, as well as geospatial data and images collected from your device camera and sensors, while you use these AR features.

We will only use your Personal Data to do the following if we have your consent:

- If you elect to turn on background activity tracking in our Services (for example Adventure Sync in Pokémon GO) we will collect your Personal Data as you use the Services as well as in the background when you do not have the Services open on your device. This includes your device location and your fitness activity data (such as Step Count, Calories Burned, and Distance Walked). We use background activity tracking to provide you certain functionalities in the Services such as in-game items and rewards tied to your fitness activity level, location, and alerts for nearby gameplay events. You can change your mind and turn off background activity tracking at any time in your device settings or in-app settings.
- With your permission we use your device's health app (Apple HealthKit if you use an Apple device, or Google Fit if you use an Android device) to collect your fitness activity data: we read and/or write your fitness activity data to your device's health app to operate background activity tracking and to ensure you get "credit" in your device's health app for all of the walking you do while playing our games. We do not use data collected through Apple Health Kit or through Google Fit for marketing or advertising purposes. Our Services cannot read from or write to your device's health app without your consent. You can change your mind and disable our access to any type of fitness activity data at any time in your Apple Health or Google Fit app settings on your device.
- If you elect to enable the Facebook User Friends permission available in some of our games, we will import from your linked Facebook account the list of your friends who also play the game and enabled Facebook User Friends. If you enable that permission, your Facebook profile picture and the name on your

Facebook account will be visible to your friends in-game. You can change your mind and unfriend other players at any time from your in-app Friends settings. You can also revoke Facebook permissions for our games directly from your Facebook account settings.

- If you elect to add information about Niantic live or in-game events to your mobile calendar, we will, with your permission, access your device's calendar and write in these events. We do not access or collect any other information from your calendar. You can change your mind and disable access to your calendar at any time in your device settings.

- If you elect to help Niantic in its efforts to develop new Augmented Reality (AR) mapping technology, you have the option, in participating games, to opt in to film public spaces around points of interest and send us your video recordings, along with associated device geospatial information. We do not collect audio on these recordings. We will anonymize this information through various means, including blurring, and use it to build a 3D understanding of real-world places, with the goal of offering new types of AR experiences to our users. You can change your mind at any time by disabling this feature in your in-app settings.

- If you elect to connect your game account with an authorized external device, such as the Pokémon Go Plus or Poké Ball Plus, we request Bluetooth permissions from your mobile device in order to connect it with the external device and enable associated game features. For the Pokémon Go Plus + device, you may also elect to share sleep data with Pokémon GO, which will be used only for the purpose of calculating rewards and displaying sleep activity in-app. You may change your mind at any time by disabling our access to Bluetooth in your device settings or by disconnecting the external device from the game.

- If you elect to import your device's address book contacts to find out which of your contacts uses our Services and to send them Friend requests, or invite them to join you in our games, apps or other aspects of our Services, we will periodically sync your contacts' information, including phone number, and email, to our servers. You are responsible for ensuring your collection and sharing with us of your contacts' information is compliant with applicable laws. This may require you to obtain your contacts' permission. We may also get information about you from other Niantic users importing or entering their contacts. We use and may store this contact information to help you and your contacts connect through our Services. You can change your mind and turn off Niantic's access to your contacts at any time in your device settings.

- If you elect to upload content, such as photos or videos from your mobile device, into our Services, we will, with your permission, access your device's media

storage. You can change your mind and disable access to your media storage at any time in your device settings.

- If you elect to connect your Amazon account to your game account in order to purchase select physical products within a game, we will collect an authentication token provided by Amazon. Amazon will also share with us your partial shipping address and partial payment information to help you understand where the product will be shipped and the payment method used. You can change your mind and unlink your Amazon account at any time by following the instructions in your in-app settings.
- Send you marketing materials by email or via in-app notifications. You can unsubscribe from these at any time in your device settings or in-app settings.

We also rely on your consent where we use cookies or similar technologies. Please see our Cookie Policy for more information about how we use them. Insofar as cookies collect Personal Data, we will process it only based on your explicit consent, in anonymized form, or under a pseudonym.

While you may disable the usage of cookies through your browser settings, Niantic currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to the lack of industry standard on how to interpret that signal