

Privacy Policy

Last updated: November 12, 2023

We care about protecting your personal information. This Privacy Policy ("Policy") explains how Learnings Co. Ltd and its subsidiaries and affiliated companies ("we," or "us") collect, use, and share your personal information when you access or use our mobile applications ("Apps"), or any associated features, content, or pages owned or operated by us (collectively, "Services") that link to this Policy. This Policy does not address the privacy practices of any third parties that we do not own or control.

Please read this Policy and the Terms of Service. **By choosing to use our Apps or Services, you acknowledge that your personal information may be used pursuant to this Policy. If you do not feel comfortable with any part of this Privacy Policy or our Terms of Service, please discontinue use of our Services immediately.**

We may modify this Policy from time to time. We will notify you of material changes to this Policy by posting the new version on the Services before the effective date of the changes. If you do not agree with the proposed changes, you should discontinue your use of the Service prior to the time the new Policy takes effect. If you continue using the Service after the new terms take effect, you understand and acknowledge that you will be bound by the modified Privacy Policy.

Personal Information That We Collect

Personal information generally means information that alone or in combination with other information, may be used to identify you. The definition of personal information (used interchangeably in this Privacy Policy with the term "personal data") depends on the applicable law based on where you are a resident. . We collect personal information from you directly, third parties, business partners, or publicly available sources.

Information You Voluntarily Provide to Us: The personal information we collect on or through our Services may include:

Account Information

When you use our Apps or Services, you may register an account with us to track your progress and to sync your activity across devices. To register an account, you may be asked to provide certain personal information to us, including your name, email address, and password. You are solely responsible for ensuring your account information is correct and up-to-date, and that you do not share login credentials with anyone else.

Order Data

We collect any personal information necessary to provide you with the Services requested. For example, when you make a purchase from us we may collect your name, billing address, shipping address, email address, and phone number.

Payment Information.

We, or service providers on our behalf, collect payment card, transaction or financial account information to fulfill your in-app purchases, such as when you subscribe or purchase premium features that provide enhanced experience and expanded functionalities.

Customer Service

We collect the personal information you provide to us when you contact us for customer service, to provide feedback, or to request information.

Preference and Survey Information

We collect any personal information you provide to us when you indicate your preferences or fill out a survey or questionnaire. For example, you may provide additional account information, such as your language preferences. You may also provide information when participating in surveys, sweepstakes, contests, or events, such as your contact information. You are solely responsible for ensuring the information you provide to us is correct and up-to-date.

Information We Automatically Collect. To the extent permitted under the applicable law, we may collect certain types of information automatically, such as whenever you interact with our Services. We may collect the following types of information automatically from you:

Activity and Usage Data

While accessing or using the Services, we may automatically collect information about how you interact with the Services. Such information may include your Internet Protocol (“IP”) address, device identifier, advertising identifier, MAC address, operating system, browser type, language preferences, referring and exiting pages, crash data, purchasing activity, and other data regarding your activities on the Services. For more information, see Section 4 below on **Cookies and Similar Technologies (“Tracking Technologies”)**.

Device Information.

When you use your desktop or mobile devices to access our Services, we may be able to identify your device’s unique device identifier, MAC address, operating system, and your mobile device’s advertising ID.

Location Information

When you use our Service, we may infer the generic physical location and geographic regions of your device from your WiFi, Bluetooth and other device settings. For example, your IP address may indicate your general geographic region. You may choose not to share your location details with us by adjusting your mobile or desktop device’s location services settings. For instructions on changing the relevant settings, please contact your service provider or device manufacturer.

Aggregate and Analytic Data

We may also combine the information we collect among our Services and across your devices for analytic, security and fraud prevention purposes. For example, we use algorithms that analyze your account status and payment information to detect the unsafe and unsecured payment. We may also use analytic data to assess your account security and provide you suggestion for improvement.

Information We Collect From Third Parties. From time to time, we may obtain information about you from third party sources as required or permitted by law. These sources may include:

Information From Social Media Platforms

You may also choose to create an account with us using your Facebook or Google account credentials. When you log in using your Facebook or Google account, you authorize Facebook or Google to provide us with your personal information such as your name, profile picture, email address, language preference, and other information as listed in the authorization.

How We Use Your Personal Information

We will only use your personal information as described in this Policy or as disclosed to you prior to such processing taking place. The purposes for which we may use your personal information include:

To Provide Our Services

We use your personal information to provide you with the Apps and any other services, purchases or requests in connection with the Services you request. This may include processing transactions, providing you with the requested features, syncing your data across your devices logged into your account, and providing you with customer service.

To Personalize Your Experience

We may process your information to personalize the Services for you. For example, we use your language preferences and country location to display the correct language and time zone in the Services. We also use certain information about your device (such as operating system version and screen resolution information) to optimize the display of pictures on your screen.

To Send You Service-Related Communications

We will use your information (such as contact information) to send you communications about your account, requested transactions, and changes in our policies. Please note that you may not opt-out of such communications, which are necessary to keep you informed about important updates about your account and the Services.

To Conduct Analytics and Other Internal Purposes

We may use your personal information to conduct analytics. This can be used for quality control, internal auditing, and to measure how our Apps, Services, and ad campaigns are performing. We also use your personal information to accumulate and report aggregate

statistical information in connection with the Apps, Services and user activity, in order to help us operate, enhance and improve our Services.

To Ensure Security of our Services

We may use your personal information for the purposes of identity verification, customer service, security protection, combatting spam, malware, and malicious activity, fraud monitoring, archiving and backups, ensuring the security of the Apps and Services that we provide to you.

To Conduct Research and Development

We may process your personal information to improve our existing Services and help us design new ones. When we do so, we may implement security measures and safeguards to protect the privacy of your personal information. For example, we may institute technical safeguards or administrative safeguards, such as restricting access to personal information to only those who need access to conduct the research and development functions.

To Promote Our Services

We use your personal information for our marketing activities. For example, we may conduct targeted marketing and send you information about our and our partners' products, events, and market studies that may be of interest to you.

To Maintain Legal and Regulatory Compliance

Our Services are subject to certain laws and regulations which may require us to process your personal information. For example, we process your personal information to pay our taxes, to fulfill our business obligations, and to manage risk as required under applicable law.

How We Share Your Personal Information

We may share your personal information in the following circumstances.

Affiliates

We may share your personal information within our corporate organization to facilitate the Services; however, we will require that your personal information still be handled in the manner described herein.

Third-Party Service Providers

We may use third parties to perform certain functions on our behalf to provide you with the Services such as:

to process payments and complete transactions you request, such as payments for our subscription service, which is processed by Apple (App Store) or Google (Google Play Store);
to process and store data, including your personal information;
to provide security for our Services; and
to conduct market research.

We have agreements with third-party service providers in place to ensure they use adequate safeguards when processing your personal information. The detailed information of the third-party service providers are as follows:

Company Name	The Shared information	Retention Period
AppLovin	Device information	We retain the data we collect through the Services for up to 2 years.
Chartboost	Device information	We may store information for longer periods for complying with our legal and regulatory obligations
Facebook Audience Network	Device information	We keep information as long as we need it to provide our Products, comply with legal obligations or protect our or other's interests.
Fyber	Device information	/

Display.io	Device information	The duration shall be for the term of the partnership with an additional period of 60 days from the expiration of the partnership until deletion of Advertiser Data by Display.io in accordance with the terms of this DPA.
Google AdMob and their partners	Device information	Some data you can delete whenever you like, some data is deleted automatically, and some data we retain for longer periods of time when necessary. When you delete data, we follow a deletion policy to make sure that your data is safely and completely removed from our servers or retained only in an anonymized form. How Google anonymizes data
Google AdSense	Device information	Some data you can delete whenever you like, some data is deleted automatically, and some data we retain for longer periods of time when necessary. When you delete data, we follow a deletion policy to make sure that your data is safely and completely removed from our servers or retained only in an anonymized form. How Google anonymizes data
IronSource	Device information	We store information for as long as is reasonably necessary for the purposes for which it was collected.
Smaato and their vendors	IP addresses, Rough geolocation information, Precise geolocation, Cookie IDs, Mobile advertising identifiers, Age, Gender, Device type and other device information, Network provider, Mobile browser	Generally speaking, we retain the information collected from the Smaato Websites and Smaato Ad Services for as long as necessary to achieve our objectives as detailed in the Policy, and to comply with our legal obligations, resolve disputes, and enforce our agreements.

Unity Ads	Device Information, Location information, Game play activity and actions, User information	We retain Personal Information for as long as is necessary or as permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.
Vungle	Device information	We retain personal information we collect from you where we have an ongoing legitimate business need to do so.
Mintegral	Device information	We will only keep your personal information for as long as necessary and in any event in relation to personal information collected by us according to the Policy we will only keep this personal information for no longer than two (2) years.
Pangle	Device information	We will retain your personal information for only as long as it is necessary to provide Chuanshanjia and its related services.
Yandex	Personal information	Yandex will only keep your Personal information for as long as it is necessary to fulfill the purpose for which it was collected or to comply with legal and regulatory requirements.
Pubmatic	Browser and Device information, Information about an End User's behavior on our Publisher Clients' Digital Properties, Information about ads served, viewed, or clicked on	We will retain personal information for the period necessary to fulfill the purposes outlined in the Policy and where we have ongoing legitimate business needs to do so (for example, to provide the Ad Services, to comply with applicable legal, tax or accounting requirements, to enforce our agreements or comply with our legal obligations) unless a longer retention period is required or permitted by law.
Amazon	Here are the types of personal information we collect	/

BidMachine	Device information	BidMachine retains the Personal Information we receive as described in the Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.
MyTarget	Device information	We will retain collected information for as long as required to perform the purposes for which the data was collected depending on the legal basis for which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain your personal information during the term that is required and/or permissible under applicable/relevant law.

AWS	Here are the types of personal information we collect	We keep your personal information to enable your continued use of AWS Offerings, for as long as it is required in order to fulfill the relevant purposes described in this Privacy Notice, as may be required by law (including for tax and accounting purposes), or as otherwise communicated to you. How long we retain specific personal information varies depending on the purpose for its use, and we will delete your personal information in accordance with applicable law.
Facebook Analytics	Device information	We keep information as long as we need it to provide our Products, comply with legal obligations or protect our or other's interests.

Firebase	Device information	Some data you can delete whenever you like, some data is deleted automatically, and some data we retain for longer periods of time when necessary. When you delete data, we follow a deletion policy to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. How Google anonymizes data
Google Analytics	Device information	Some data you can delete whenever you like, some data is deleted automatically, and some data we retain for longer periods of time when necessary. When you delete data, we follow a deletion policy to make sure that your data is safely and completely removed from our servers or retained only in anonymized form. How Google anonymizes data
Appsflyer	Personal Information, Technical Information, Usage Information	We may retain your Personal Information for such time needed to pursue our legitimate business interests, in connection with any legal claims and compliance with legal obligations.

Merger, Acquisition, or Other Business Transaction

We may disclose and transfer your personal information to a subsequent owner, co-owner, or operator of our Apps or Services, or in connection with a contemplated or agreed upon merger, acquisition, consolidation, restructuring, or the sale of substantially all our interests and/or assets (i.e., a bankruptcy proceeding). We shall require the subsequent owner, co-owner, or operator in possession of your personal information to continue to be subject to this Privacy Policy; otherwise, we shall request that they provide any necessary notice and/or obtain consent from you.

Legal Obligations and Safety

We may disclose your personal information if it is reasonably necessary to:

Comply with a valid legal process (e.g., subpoenas, warrants, court orders, etc.);
Comply with valid requests or investigations by public authorities;
Comply with applicable laws or regulations;
Enforce our policies, agreements, and terms, whether in litigation, other disputes, or otherwise;
Protect our legitimate interests, including legal interests;
Protect the security or integrity of the Services; or
Protect the rights, property, or safety of you, other users, employees, partners and affiliates, or other natural persons.

We will, at our discretion, provide you with advance notice if we are compelled to disclose your personal information to law enforcement, public authorities, or other governmental entities, unless we are prohibited from doing so by governmental entities or the law.

With Your Consent

We may transfer your personal information for other reasons after obtaining your consent.

Cookies and Similar Technologies (“Tracking Technologies”)

What are cookies and tracking technologies?

Cookies are small data files, typically of letters and numbers, that are placed by a web server on your device. We and companies we work with may use cookies and similar technologies, including pixel tags, web beacons, mobile analytics features, and mobile identifiers (collectively, “tracking technologies”) to collect information for many reasons, such as to keep you logged in to your account, remember your preferences and settings, analyze usage of our Services, measure the performance of our Services and advertising campaigns, and ensure security on our Services. Some of the functions performed by tracking technologies are strictly necessary for us to be able to offer you our Services, while others provide us with valuable insight about how we can improve or market our Services.

What types of tracking technologies do we use?

We use the types of tracking technologies described below on our Services:

Types of Tracking Technologies	Description
Strictly Necessary	Some of the tracking technologies we use are necessary to provide our Services to you. For example, they help you: navigate from page to page; stay logged into your account; and support and enable security features. Without such tracking technologies, some of our Services cannot be provided to you.
Functional	Functional tracking technologies collect information about how you use our Services, provide you with certain functions on our Services, and remember your preferences.

Analytics, Performance and Research	These tracking technologies help us understand how well our Services are doing. They collect information about your use and interaction with our Services so that we can continue to improve and expand our Services.
Marketing	Marketing tracking technologies allow us to collect information about your interactions with our marketing activities, such as parts of our website and our emails. They help us measure the performance of our Services and advertising campaigns. In addition to the marketing tracking technologies deployed by us, third parties may use marketing tracking technologies to collect information about your use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites.

How to manage tracking technologies

We use third-party tracking technologies that allow us to automatically collect information through our Services that can recognize your device both when it visits our Services and when it visits other websites or mobile apps. We encourage you to check the websites of any third-party tracking technology providers for more information about how they use the information they collect.

Below we describe how you can manage tracking technologies on our Services:

Through Your Browser

You can enable, disable or delete tracking technologies via your browser settings. To do this, follow the instructions provided by your browser, usually located within the “Help”, “Tools” or “Edit” settings of your browser or mobile device. Please be aware that if you set disable tracking technologies on your browser, you may not be able to access secure areas of the Services and parts of the Services may also not work properly (e.g., preferences, referral links).

Many browser manufacturers provide helpful information about cookie management, including, but not limited to:

[Google Chrome](#)

[Internet Explorer](#)

[Mozilla Firefox](#)

[Safari \(Desktop\)](#) or [Safari \(Mobile\)](#)

[Android Browser](#)

[Opera](#)

If you use a different browser than those listed above, please refer to your specific browser’s documentation or check out <http://www.allaboutcookies.org/browsers/index.html> to learn more about different browsers. You can also find out more information about how to change your browser cookie settings at www.allaboutcookies.org.

You may also opt-out of cookies within web browsers by visiting industry-created opt-out platforms such as http://networkadvertising.org/managing/opt_out.asp and/or <https://optout.aboutads.info/?c=2&lang=EN>, or if you are in the European Union, <http://www.youronlinechoices.eu/>. You can also click on the AdChoices logo within an advertisement (where available).

Through Your Mobile Settings

You may be able to control or limit mobile tracking technologies in your mobile device settings. Please follow the instructions provided by your mobile device, usually located in “Settings” of

your mobile device. Many mobile device manufacturers provide helpful information about how to do this:

- [Apple](#)
- [Google/Android](#)

You can opt-out of interest-based advertising on mobile applications by checking the privacy settings of your Android or iOS device and selecting “limit ad tracking”(Apple iOS) or “opt-out of interest based ads”(Android).

Additionally, please visit <http://aboutads.info/appchoices> to learn about and download the Digital Advertising Alliance’s free consumer choice app, AppChoices, which allows you to opt-out directly from companies listed in the app.

Through Third Parties

Within Section 14 below, which lists our service providers and partners, as well as links to each third party’s website for information about how they use tracking technologies to collect and use your information, and how you may be able to opt-out of tracking.

Marketing

We may use your personal information to send you messages about new products and services, events, or other information that may be of interest to you, whether through email or other methods. If you do not wish to receive such information, you can change your account settings or click the “unsubscribe” button in email communications. Please note that you will not be able to opt-out of receiving transactional communications; otherwise, you may miss important information about your account or the Services.

Security

We take the security of personal information seriously. We take reasonable measures to protect your personal information and to ensure the accuracy and timely update of the personal information collected about you.

Please understand that due to the nature of the internet industry, it is impossible to ensure that systems are 100% secure. You should understand that the systems may encounter issues due to the factors beyond our control, such as malicious actors. We also depend on you to keep your account information and other personal information secure by keeping your password confidential and taking precautions to keep others from accessing your account. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Transfers of Your Personal Information

We are an international organization operating in Hong Kong. When you access or use our Services, your personal information may be processed in Hong Kong, the People’s Republic of China, or any other country in which we, our Affiliates, or our service providers maintain facilities. Such countries or jurisdictions may have data protection laws that are less protective

than the laws of the jurisdiction in which you reside. If you do not want your information transferred to, processed, or maintained outside of the country or jurisdiction where you are located, you should immediately stop accessing or using the Services.

Company Name	Purpose	Contact	Personal Information on Transfer Country	What is Transferred	Date and Method	Retention Period
LEARNINGS CO., LIMITED	To provide our services, personalize your experience, send you service-related communications, conduct analytics and other internal purposes; To ensure security of our services, conduct research and development; To promote our services, maintain legal and regulatory compliance.	support@learnings.ai	HongKong, China	Any information we collect	Transfer through the network when the service is used	At the time of membership withdrawal or termination of the consignment contract

If you are in the European Economic Area, the United Kingdom, or Switzerland, please refer to Section 13 below entitled **Special Notice to Individuals in the European Economic Area, United Kingdom, and Switzerland**.

Your Rights and Choices

Depending on applicable law where you are a resident, you may be able to assert certain rights related to your personal information. The rights you may have include:

Right to Know/Access. You may have the right to obtain a copy, or a list of categories of the personal information that we hold about you, as well as other supplementary information, such as the purposes of processing, and the entities to whom we disclose your personal information.

Right to Correction/Rectification. You may have the right to correct any of your personal information in our files. You may request us to rectify, correct or update any of your personal information held by us that is inaccurate. You may also do this at any time by logging in to your account and clicking the Profile or My Account tab.

Right to Delete/Erasure. Under certain circumstances, you may have the right to request that we delete the personal information that we hold about you, or request us to deactivate/delete your account. This right is not absolute, and we may refuse your right to delete if there are compelling legitimate grounds for keeping your personal information, for legitimate business purposes or as required by law.

Right to Opt Out of Sale. You may have the right to opt-out of the sale of your personal information to third parties. We do not sell your personal information to unaffiliated third parties for monetary or other valuable consideration.

Right to Opt Out of Targeted Advertising. You may have the right to opt-out of the sharing of your personal information to third parties for behavioral advertising purposes. Like many websites, we use cookies, pixels, and similar technology, and we share certain information, such as your IP address or device identifiers, to certain third-party advertisers in order to improve your user experience and to optimize our marketing activities. You have the right to direct us not to share or use your personal information for targeted advertising purposes. To exercise your right to opt-out, please submit a request by clicking on “Your Privacy Rights” located in the footer of our Services. Please note that you may still receive generalized ads after opting out of targeted advertising.

Right to Object to Use of Sensitive Information. In some jurisdictions, you may have the right to object to our processing of your sensitive personal information as defined and permitted under applicable law. However, we may continue to process your personal information if it is necessary for the defense of legal claims, or for any other exceptions permitted under applicable laws.

Right to Object to Automated Decision-Making. In some jurisdictions, you may have the right not to be subject to a decision which significantly impact your rights that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement). No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.

Right to Object to Processing. You may have the right to object to our processing at any time and as permitted by applicable law if we process your personal information on the legal bases of: consent; contract; or legitimate interests.

Right to Portability. Under certain circumstances, you may have the right to receive personal information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that personal information to another entity.

Right to Restriction. You may have the right to request that we restrict our processing of your personal information under certain circumstance. For instance, this right is available if you contest the accuracy of the personal information or you objected to our processing in certain jurisdictions.

Right Against Discrimination. You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your rights.

Right to Lodge Complaints. Without prejudice to any other administrative or judicial remedy, you may have the right to lodge a complaint with a supervisory authority in a specific region according to applicable law.

European Economic Area, United Kingdom, and Switzerland Individuals: If you are located in the European Economic Area, United Kingdom, or Switzerland at the time of personal information collection, you may have the following rights: Right to Know/Access, Right to Correction/Rectification, Right to Delete/Erasure, Right to Object to Automated Decision-Making, Right to Object to Processing, Right to Portability, Right to Restriction, and Right to Lodge Complaints.

California Residents: If you are a California resident at the time of personal information collection, you may have the following rights: Right to Know/Access, Right to Correction/Rectification, Right to Delete/Erasure, Right to Opt Out of Sale, Right to Opt Out of Targeted Advertising, Right to Object to Use of Sensitive Information (Effective January 1, 2023), Right to Object to Automated Decision-Making, Right to Portability, and Right Against Discrimination.

Virginia Residents (Effective January 1, 2023): Right to Know/Access, Right to Correction/Rectification, Right to Delete/Erasure, Right to Opt Out of Sale, Right to Opt Out of Targeted Advertising, Right to Object to Automated Decision-Making, Right to Object to Processing, Right to Portability, and Right Against Discrimination.

Colorado Residents (Effective July 1, 2023): Right to Know/Access, Right to Correction/Rectification, Right to Delete/Erasure, Right to Opt Out of Sale, Right to Opt Out of Targeted Advertising, Right to Object to Automated Decision-Making, Right to Object to Processing, Right to Portability, and Right Against Discrimination.

Connecticut Residents (Effective July 1, 2023): Right to Know/Access, Right to Correction/Rectification, Right to Delete/Erasure, Right to Opt Out of Sale, Right to Opt Out of Targeted Advertising, Right to Object to Automated Decision-Making, Right to Portability, Right to Restriction, and Right Against Discrimination

Please note that, we may limit your individual rights requests: (a) where denial of access is required or authorized by law; (b) when granting access would have a negative impact on others' privacy; (c) to protect our rights and properties; or (d) where the request is frivolous or unrealistic. If you would like to exercise your rights under applicable law, please contact us at support@learnings.ai with the subject line "My [YOUR JURISDICTION] Privacy Rights." As required by law, we may require you to prove your identity. We may conduct an identity verification by email. Depending on your request, we may ask for information such as your name, your account username, or the date of your last purchase from us. In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require your authorized agent to provide a copy of the signed permission to make a request on your behalf. We will still require you to verify your own identity directly with us.

Retention

In general, we keep your information for as long as necessary to achieve the purposes stated in this Policy or to comply with the applicable law. Otherwise, we will try to delete your personal information upon your request or when we no longer need it for the purposes for which it was originally collected, although we reserve the right to retain such information indefinitely for the establishment or defense of legal claims, audit, or fraud and/or crime prevention purposes. We will not delete any personal information about individuals other than

yourself, unless such other individual also wishes to delete their personal information at the same time.

We recognize that retention requirements can vary between jurisdictions, but we generally apply the retention periods described below.

Account information: We will retain information associated with your account as long as your account remains active or as necessary to provide you with the requested services.

Information collected from tracking technologies: we generally retain such information for as long as necessary for usage analytics, the establishment or defense of legal claims, audit, or fraud and/or crime prevention purposes.

Marketing data: Any contact information you provide to us for marketing purposes, such as your name, email address, and phone number, is retained on an on-going basis until you unsubscribe from our marketing communications. If you unsubscribe, we will add your contact information to our do-not-contact list to respect your unsubscribe request.

Personal Information Destruction Procedure and Method

The user's personal information is destroyed without delay when the purpose of collection and use is achieved (here, 'when the purpose of use is achieved' means a request for withdrawal, expiration of service contract, or withdrawal). If there is a specified storage period, it is stored for a certain period and then destroyed.

Personal information printed on paper is destroyed by crushing or incineration with a shredder, and records stored in the form of electronic files are deleted using a technical method that cannot be reproduced.

Children

Our Services are not intended for use by children under the age of sixteen (16) (or other age as required by local law). We will not knowingly collect personal information directly from children under the age of sixteen (16) (or other age as required by local law) without parental consent. If you are under the age of sixteen (16) (or other age as required by local law), please do not provide us with information of any kind whatsoever. We encourage parents and guardians to spend time with their children online and to be familiar with the websites they visit. If you have reason to believe that we may have accidentally received information from a child under the age of sixteen (16) (or other age as required by local law), please contact us immediately according at support@learnings.ai.

Do Not Track

Some Internet browsers - like Internet Explorer, Firefox, and Safari - include the ability to transmit "Do Not Track" ("DNT") signals. Since uniform standards for DNT signals have not been adopted, we currently do not process or respond to DNT signals on our Services.

Special Notice to California Residents

This section applies only to California residents. The purpose of this section is to inform our App and Services users who are California residents, as defined in Section 17014 of Title 18 of the California Code of Regulations, about our personal information collection practices. The chart below describes the categories of personal information (as defined under Cal. Civ. Code §1798.140(v)(1)), that we may have collected in the preceding 12 months from you, and provides information about the sources and purpose of such collection. For a list of the other parties with whom your Personal Information may have been shared for a business purpose, please refer to section 3, above.

Personal Information Category	Personal Information Category <i>(see section 1, above)</i>	Sources of Personal Information Collection	Purpose of Collection
(A) Identifiers	Account Information	Voluntarily provided by You	Provide any services or products that you request or purchase in connection with the Services Administer your account and communicate with you about account status, premium feature status, and requested transactions. Notify you about changes to our Services, our policies, or terms. Notify you about new products, services, features, promotions, events and special offerings we think you may of interest to you. Facilitating corporate acquisitions, mergers and transactions Maintaining legal and regulatory compliance
	Device Information	Automatically collected by us	Provide any services or products that you request or purchase in connection with the Services
	Information from Social Media Platforms	Information from Third Party Sources	Administer your account and communicate with you about account status, premium feature status, and requested transactions. Conduct targeted marketing and send you information about our and our partners' products, events, and market studies that may be of interest to you.
(B) Personal information under California Civil Code section 1798.80	See corresponding rows related to the following Personal Information Categories (column 2): <i>Account Information, and Order Data.</i>		

(D) Commercial information, such as records of service purchased	Order Data	Voluntarily provided by You	Provide any services or products that you request or purchase in connection with the Services Maintaining legal and regulatory compliance
	Customer Service	Voluntarily provided by You	Respond to your comments and questions and provide customer service Provide, maintain, and improve the Services and customer service Maintaining legal and regulatory compliance
	Payment Information	Voluntarily provided by You	Provide any services or products that you request or purchase in connection with the Services Maintaining legal and regulatory compliance
(F) Internet activity information, such as browsing history	Activity and Usage Data	Automatically collected by us	Provide, maintain, and improve the Services and customer service To understand your interests Enhance your gaming experience Monitor and analyze trends, usage and activities Link or combine with other information we receive from third parties to help understand your needs and provide you with better Services
(G) Geolocation data	Location Information	Automatically collected by us Voluntarily provided by You	Provide any services or products that you request or purchase in connection with the Services Administer your account and communicate with you about account status, premium feature status, and requested transactions.
(K) Inferences about preferences, characteristics, etc.	Preference and Survey Information	Voluntarily provided by You	Understand your interests and preferences Monitor and analyze trends, usage and activities Enhance gaming experience Provide, maintain, and improve our Services

	Aggregate and Analytic Data	Automatically collected by us	Provide, maintain, and improve the Services To understand your interests Enhance your gaming experience Monitor and analyze trends, usage and activities Link or combine with other information we receive from third parties to help understand your needs and provide you with better service Personalize the Services and provide advertisements, content, or features that are targeted toward your interests
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Special Notice to Individuals in the European Economic Area, United Kingdom, and Switzerland

This section only applies to individuals located in the European Economic Area, United Kingdom, or Switzerland (collectively, the “Designated Countries”) at the time of data collection.

We may ask you to identify which country you are in when you use or access some of the Services, or we may rely on your IP address to approximate which country you are located in. When we rely on your IP address, we cannot apply the terms of this section to any individual that masks or otherwise hides their location information from us so as not to appear located in the Designated Countries. If any terms in this section conflict with other terms contained in this Policy, the terms in this section shall apply to individuals in the Designated Countries.

Our Relationship to You

We are a data controller with respect to any personal information collected from individuals accessing or using our Services. A “data controller” is an entity that determines the purposes for which, and the manner in which any personal information is processed. Any third party that acts as our service provider or is otherwise acting on our behalf is a “data processor” that handles your personal information in accordance with our instructions.

Legal Bases for Processing Your Personal Information.

Below is a list of the purposes described in this Policy with the corresponding legal bases for processing.

Purpose for Processing	Legal Bases for Processing
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Section 2: How We Use Your Personal Information 2(a) To Provide Our Services 2(c) To Send You Service-Related Communications Section 3: How We Share Your Personal Information 3(a) Affiliates 3(b) Third-Party Service Providers.	Based on our contract with you or to take steps at your request prior to entering into a contract.
Section 3: How We Share Your Personal Information 3(e) With Your Consent	Based on your consent.
Section 2: How We Use Your Personal Information 2(h) To Maintain Legal and Regulatory Compliance Section 3: How We Share Your Personal Information 3(d) Legal Obligations and Safety	Based on our legal obligations.
Section 2: How We Use Your Personal Information 2(e) To Ensure Security of our Services Section 3: How We Share Your Personal Information 3(d) Legal Obligations and Safety	To protect your vital interests.
Section 2: How We Use Your Personal Information 2(b) To Personalize Your Experience 2(d) To Conduct Analytics and Other Internal Purposes 2(f) To Conduct Research and Development 2(g) To Promote Our Services Section 3: How We Share Your Personal Information 3(c) Merger, Acquisition, or Other Business Transaction 3(d) Legal Obligations and Safety	2(b) and 2(g) - Based on our legitimate interests in understanding our users and providing tailored services. 2(d) - Based on our legitimate interests in making our website operate efficiently. 2(f) - Based on our legitimate interests in developing new products and improving existing products. 3(c) - Based on our legitimate interest in maintaining our business operations. 3(d) - Based on our legitimate interest in detecting and preventing fraud.

Marketing

We will only contact you if you are located in the Designated Countries by electronic means (including email or SMS) based on our legitimate interests, as permitted by applicable law, or with your consent. If you do not want us to use your Personal Information in this way, please click the unsubscribe link at the bottom of any of our email messages to you or contact us at the email at the bottom of this page. You can object to direct marketing at any time and free of charge.

Transfer of Your Personal Information

We transfer your personal information subject to appropriate safeguards as permitted under the relevant data protection laws. The transfer of your personal information out of the Designated Countries is necessary for the performance of our contract with you, or the performance of a contract between us and another party that we entered into for your interest, or for important reasons of public interest. When transferring your personal information out of a Designated Country, we rely on legal transfer mechanisms such as Standard Contractual Clauses.

Service Providers and Partners

We use third parties to help us operate and improve our Services. These third parties assist us with various tasks, including hosting and maintenance, on-going development, analytics, customer care, marketing, advertising. We may also share information with advertising partners who distribute advertising in our Services.

Advertising networks and their partners

The below companies assist us by providing services relating to advertising and marketing. The advertising networks, analytics providers, and other companies listed below may collect or receive device information from our apps on your browser or device for advertising purposes, including personal and non-personal information, such as advertising (or ad) identifiers, IP address, or other information regarding the delivery of advertisements and your interaction with them, the inventory of installed apps and/or other tracking technologies to provide measurement services, personalization, ad selection, delivery, reporting, and optimize targeted ads. Ad identifiers are non-permanent device identifiers such as the Android advertising ID and/or Apple's ID for advertising (IDFA). For more information on how to opt-out of advertising, please see "How To Manage Tracking Technologies" in [section 4\(c\)](#) above. In addition, the advertising networks listed below, with the exception of **Fyber**, **Mobfox**, and **PubNative**, who act as data processors upon our instructions, are independent data controllers in respect of your personal information and you can learn more about how each handles your data or provides opt-outs by accessing their respective privacy notices using the hyperlinks below.

Company Name	Brief Introduction	Privacy Policy

AppLovin	AppLovin is an advertising service provided by AppLovin Corporation. (US)	https://www.applovin.com/privacy
Chartboost	Chartboost is an advertising service provided by Chartboost, Inc. (US)	https://answers.chartboost.com/en-us/articles/200780269
Facebook Audience Network	Facebook Audience Network is an advertising service provided by Facebook, Inc. (US) that may collect or receive information from our apps and other apps and use that information to provide measurement services and targeted ads. Facebook does not require opt-in or opt-out signals from users in our services. Relevant signals are collected directly from the user upon creating an account in such Services.	https://www.facebook.com/about/privacy/

Fyber	Fyber is an advertising service provided by Fyber Group. (Israel)	https://www.fyber.com/legal/privacy-policy/
Display.io	Display.io is an advertising service provided by Display.io. INC (US)	https://www.display.io/privacypolicy/
Google AdMob and their partners	AdMob by Google is provided by Google Inc. (US)	http://www.google.com/policies/privacy/ <hr/> For more information on AdMob Partners, please visit: https://support.google.com/admob/answer/9012903 <hr/> You can opt-out from AdMob by Google service by following the instructions described by Google: https://support.google.com/ads/answer/2662922?hl=en
Google AdSense	Google, as a third-party vendor, uses cookies to serve ads on our Service. Google's use of the DoubleClick cookie enables it and its partners to serve ads to our users based on their visit to our Service or other websites on the Internet.	You may opt-out of the use of the DoubleClick Cookie for interest-based advertising by visiting the Google Ads Settings web page: http://www.google.com/ads/preferences/

IronSource	IronSource is an advertising service provided by IronSource, Inc. (US) and does not require opt-in or opt-out signals from users in our Services, since they provide only non-personalized ads in our Services.	http://www.ironsrc.com/wp-content/uploads/2017/01/ironSource-Privacy-Policy.pdf
Smaato and their vendors	Smaato is an advertising service provided by Smaato, Inc. (US)	https://www.smaato.com/privacy/ <hr/> For more information on the Smaato Vendors, please visit: https://www.smaato.com/partner-list/
Unity Ads	Unity Ads is an advertising service provided by Unity Ads Inc. (US)	https://unity3d.com/legal/privacy-policy
Vungle	Vungle is provided by Vungle, Inc. (US)	http://vungle.com/privacy/
Mintegral	Mintegral is provided by Mintegral International Limited(China)	https://www.mintegral.com/en/privacy/

Pangle	Pangle is provided by ByteDance Pte. Ltd. (Singapore)	https://ad.oceanengine.com/union/media/privacy
Yandex	Yandex is provided by Yandex Europe AG (Russia)	https://yandex.com/legal/confidential/
Pubmatic	Pubmatic is provided by Pubmatic, Inc (US)	https://pubmatic.com/legal/privacy-policy/
Amazon	Amazon is provided by Amazon.com, Inc. (US)	https://www.amazon.com/gp/help/customer/display.html?nodeId=468496
BidMachine	BidMachine is provided by BidMachine, Inc. (US)	https://bidmachine.io/privacy-policy/
MyTarget	MyTarget is provided by My.com B.V. (Netherlands)	https://legal.my.com/us/mytarget/privacy/

b) Analytics and other service providers

We use your information to perform our own analytics and to enable analytics provided by third parties and other essential functions. We use analytical information for supporting

business analysis and operations, business intelligence, product development, improving the Services, personalizing content, providing advertising, and making recommendations. In order to learn about how your information is used by our analytics service providers, you can follow the hyperlinks in the list below to each provider's privacy notice.

Company Name	Brief Introduction	Privacy Policy
AWS	AWS is a cloud computing service provided by Amazon Web Services, Inc. (US).	https://aws.amazon.com/privacy/
Facebook Analytics	Facebook Analytics is an analytics tool provided by Facebook, Inc. (US) that may collect or receive information from our apps and other apps and use that information to provide measurement services.	https://www.facebook.com/about/privacy/
Firebase	Firebase is an analytics service provided by Google Inc. (US). You may opt-out of certain Firebase features through your mobile device settings.	http://www.google.com/intl/en/policies/privacy/
Google Analytics	Google Analytics is an analytics service provided by Google Inc. (US)	https://policies.google.com/privacy
Appsflyer	Appsflyer Analytics is an analytics service provided by Appsflyer Ltd. (Israel)	https://www.appsflyer.com/privacy-policy

Contact Us

For any questions regarding our Privacy Policy or our privacy practices, please contact us.

Contact: info.vnworks@gmail.com