

Privacy Policy

Last Updated: December 12, 2018

[TRUSTe Kids Privacy](#)

Welcome! This Privacy Policy explains how ZeptoLab UK Limited ("**ZeptoLab**" or "**we**") collects, uses, and shares your personal information while you play ZeptoLab's games ("**Games**") and/or use ZeptoLab's websites that link to this Privacy Policy ("**Websites**").

We may make changes to this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we will notify you via email if we have your email address on record, or via a notice on the Websites and/or Games prior to the change becoming effective.

1. What kind of personal information does ZeptoLab collect?

We aim to minimize how much personal information we collect from users when they play the Games or use the Websites. We collect the personal information that you voluntarily provide to us (e.g. email addresses you give us to subscribe to our Newsletters (as defined below)), but most of our data collection is limited to the following types of data, which do not identify you personally but may uniquely identify the device you are using to play to the Games or use the Websites ("Device"). In some countries, this type of data may be considered as personal information:

- "**Advertising ID**", which means the resettable and unique identifier associated with your mobile phone or tablet that is used by advertisers for ad tracking.
- "**Location Information**", which means general information about the location from which you're playing the Games or using the Websites (e.g. IP address, country, and city).
- "**Device Information**", which means technical information about your Device. When we refer to Device Information, this means your Device ID, your internet service provider (ISP), your browser and browser plug-in types, operating system and operating system version, jailbreak information, network information, the brand and manufacturer of your Device, the language you've set for your Device, the version of the Game installed on your Device, and the name of your carrier.

Personal Information	Purpose(s)
When You Play the Games	
Your Age	When you install our Games, you will be asked to provide your age. We use this information to enable or disable certain Game features and certain types of ads shown to you depending on your age and where you are from. For more information about our policies for children's personal information, please see Section 6.
Advertising IDs, Location Information, and Device	Analytics – for more information, please see Section 4. Advertising – for more information, please see Section 5.

Information	
Information from Connected Facebook Accounts	In some of our Games, you may connect your Game account to your Facebook account so that you can keep up with your friends' progress as they play the Game. Depending on your Facebook privacy settings, we will collect your gender, age range, and which of your friends on Facebook are also playing the Game. To manage the information we receive from Facebook, you will need to follow instructions provided by Facebook and change your privacy settings.
Name and email address, Location Information, Device Information	<p><u>Customer Support</u></p> <p>You have the option to contact our customer support team directly from some of our Games. When you do, we will collect and use this information to respond to your requests and/or comments.</p>
<b>When You Visit and Use the Websites</b>	
Name, email address, and/or phone number	<p><u>Newsletter Subscriptions</u></p> <p>On some of our Websites, you may provide us with your email address to sign up for a mailing list to receive newsletters and other marketing or promotional communications about a specific Game ("<b>Newsletters</b>"). We will use your name and email address to send you periodic Newsletters. For instructions on how to opt-out of receiving Newsletters, please see Section 8.</p> <p><u>SMS Updates</u></p> <p>From time to time, you may have the option to receive special updates about ZeptoLab via a SMS text message. When this option is available, you may provide your phone number and we will only use this number to send you an SMS text message about the update.</p> <p><u>Customer Support</u></p> <p>If you contact our customer team, whether via email or by filling out a contact form on the Websites, we will collect and use this information to respond to your requests and/or comments.</p>
Display name and email address	<p><u>Message Boards</u></p> <p>Some of our Websites have message boards so that you can post public messages and communicate with other Game players. To participate on the message boards, you will need to create an account by providing a display name, email address, and password.</p> <p>Please note that if you participate in the message boards, then any information you post will be public.</p>
Advertising IDs, Location Information, and Device Information	Analytics – for more information, please see Section 4.

Name, email address, and phone number	<b><u>Job Applications</u></b> If you apply for a job with ZeptoLab through <a href="http://www.zeptolab.com">www.zeptolab.com</a> , we will collect and use this information to process your application. We may also use this information to contact you in connection with your application.
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## **Does ZeptoLab Collect My Financial Information When I Make In-App Purchases?**

When you make in-app purchases in the Games, we do not collect or have any access to your name and billing information. This information is collected and stored by your platform (e.g. Apple's Game Store or Android's Google Play) or your platform's payment processor.

## **2. Do third parties have access to my personal information?**

Yes. Like most companies, we use tools from service providers to help us with various parts of our business ("Service Providers"), and depending on the service we need, these Service Providers may have access to your personal information. For example, we use a Service Provider's email software to manage our Newsletter subscriptions, and if you have given us your email address to subscribe to Newsletters, then your email address will be shared with that Service Provider. We also use Service Providers for hosting, customer support, and mobile and web analytics. For a list of the Service Providers who have access to your personal information, please click [here](#).

We contractually require all Service Providers to treat your personal information as confidential information and to only use it for the services we need. However, we do not have direct control over how Service Providers use your personal information and we cannot guarantee that our Service Providers will use your personal information as required in our contract with them. For this reason, we are not responsible for our Service Providers' misuse of your personal information.

In addition to our Service Providers, our Ad Partners may also have access to your personal information. We've dedicated a separate section about advertising and our Ad Partners, so please check that out in Section 5. We may also share your personal information for our legitimate business and legal purposes as described in Section 12.

## **3. How long will ZeptoLab keep my personal information?**

How long we store your personal information will depend on the purpose that we originally collected it. We will not retain personal information for longer than is necessary for our business or for legal requirements.

## **4. How is my personal information used for analytics?**

As an online business, it is important for us to know how users interact with our Websites and Games. We and our Service Providers will collect your Location Information, Device Information, and Advertising IDs so that we can deliver our Game and Website services to our users, measure, analyze, and improve performance of the Games and Websites, and to continually update and develop our Games and Websites. For example, we will use this information to assess the difficulty level of Games, fix any bugs or errors in the Games, evaluate the demographic of our users, and to determine whether or not we need to support a new Device type for the Games. In addition, if you have connected your Game account to your account on Facebook, we will use the information described in Section 1 to conduct analytics.

## **5. How is my personal information used for advertising?**

## **A. Ad Partner Technologies**

To help us keep our Games running, we show ads in our Games with the help of third-party advertising partners ("**Ad Partners**"). We integrate Ad Partners' technologies into our Games which are then used by the Ad Partners to determine what kind of ads to display to you.

### **i. Do Ad Partners Collect My Personal Information?**

In order to show you ads that you might find interesting and/or relevant ("Targeted Ads"), Ad Partners collect and use your Advertising ID, Location Information, and Device Information. If location services are enabled in your Device settings, the Ad Partners may additionally collect your geolocation information. Because these Ad Partners' technologies control what kind of personal information is collected from your Device and how it is used, we encourage you to review their respective privacy policies. A list of our Ad Partners is found here: [www.zeptolab.com/privacy\\_personal](http://www.zeptolab.com/privacy_personal).

### **ii. How to Opt-Out of Receiving Targeted Ads.**

If you do not want to receive Targeted Ads on your mobile Device, your mobile Device may give you the option to opt-out of receiving Targeted Ads on all apps on your Device. On Android Devices, you may opt-out by enabling the "Opt out of Ads Personalization" setting. On iOS Devices, you may opt-out by enabling the "Limit Ad Tracking" setting. In addition, you may be able to opt-out of receiving Targeted Ads from a specific Ad Partner. Please review our Ad Partner list found [here](#) to see if an Ad Partner offers the ability to opt-out of receiving Targeted Ads. Please note that if you opt-out of receiving Targeted Ads, you will still receive contextual ads, which are non-targeted ads related to the content of the Game you are playing.

## **B. Ads for the Games on Third-Party Websites and/or Apps**

In addition to running ads in our Games, we also run ads to promote our Games in third-party websites and/or apps. When we run our own ads in third-party websites and/or apps, Service Providers help us optimize and measure performance of our ads and use their own tracking technologies to track Game installs and clicks and/or impressions of our ads. In some cases, we will share your hashed or anonymized Advertising ID with our Ad Partners so that the Ad Partner can help us market and promote our Games. In these cases, Ad Partners perform as ZeptoLab's Service Providers and we contractually require such Ad Partners to only use your personal information on our behalf. If you wish to opt-out of your personal information being shared with Ad Partners in this way, please contact us at [privacy@zeptolab.com](mailto:privacy@zeptolab.com).

## **6. Children's personal information.**

We do not knowingly collect children's personal information without parental consent, except as permitted under applicable laws such as the U.S. Children's Online Privacy Protection Act (COPPA) and the EU General Data Protection Regulation (GDPR). For example, ZeptoLab, its Service Providers, and its Ad Partners may collect personal information, such as IP addresses and other persistent identifiers, from children under 16 strictly to support ZeptoLab's internal operations and/or legitimate interests, such as analytics and to serve children with contextual ads. If you are a parent of a child playing the Games or using the Websites, you may review or have your child's personal information deleted and refuse the further collection of his/her personal information by contacting us at [privacy@zeptolab.com](mailto:privacy@zeptolab.com). Please contact us at [privacy@zeptolab.com](mailto:privacy@zeptolab.com) if you believe we are collecting a child's personal information in violation of COPPA or the GDPR and we will delete this information as quickly as possible. For a list of ZeptoLab's Service Providers, please visit here: [https://www.zeptolab.com/privacy\\_personal](https://www.zeptolab.com/privacy_personal).

ZeptoLab will retain your child's information for as long as your child's account is active, or as needed to provide services. If you wish to cancel your child's account or request that ZeptoLab no longer use the information to provide services, contact ZeptoLab at the email address listed above. ZeptoLab will retain and

use the information as necessary to comply with our legal obligations, resolve disputes and enforce our agreements. If your child uses our contact us form to contact us, we will delete their email address immediately after responding to their request.

If we want to change how we use personal information collected from children, we will first notify you by either posting an update on the Websites and/or the Games and you will be required to review, sign, and send to ZeptoLab a consent form to approve how we will use your child's personal information.

## **7. Cookies and similar tracking technologies.**

We and our Service Providers use cookies, local storage, e-tags, or similar technologies on the Websites to conduct analytics as described in Section 4 above and to optimize the Websites' functionality and performance. To learn more, please check out our Cookie Policy, found here: [www.zeptolab.com/cookies](http://www.zeptolab.com/cookies).

## **8. How do i unsubscribe from/opt-out of receiving newsletters?**

If you wish to unsubscribe from receiving Newsletters, you can click on the "unsubscribe" link at the bottom of the email and you will stop receiving Newsletters or for that specific Game you were subscribed to. Please allow up to 24 hours before you stop receiving Newsletters. Please note that if you are subscribed to more than one Game mailing list, you will continue to receive Newsletters for those other Games. You may also continue to receive emails unrelated to marketing.

## **9. Third-parties and their privacy policies.**

Throughout the Websites, you may see links to third-party websites or applications. We are not responsible for the privacy practices of these third-party sites, and when accessing their sites, we encourage you to read their privacy policies.

## **10. Is my personal information secure?**

The security of your personal information is important to us. We follow generally accepted industry standards to protect your information, both during transmission and once it is received. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. While no security system is completely secure, we and our Service Provider stake appropriate security measures to protect against unauthorized access or disclosure of the information collected by us. For ZeptoLab, this includes, but is not limited to, ensuring that all of your information is disclosed only on a "need to know" basis and ensuring that all information collected by ZeptoLab is done so via secured connections and protected and encrypted (using secure socket layer technology,"SSL") by industrial grade security software to guard against unauthorized access.

## **11. Push notifications.**

After downloading a Game, you will be asked to accept or refuse push notifications. If you accept push notifications, we will collect and use push notification tokens to send you Game-specific notifications on your mobile Device. You may disable push notifications at any time by going to your Device settings.

## **12. Social media features and tools.**

The Websites and Games may include integrated social media features and tools, such as the Facebook "Like" button, the YouTube "Share This" button, and the Twitter "Follow" button. These features may collect information on your IP address, which Website you are visiting, and may set a cookie to enable the feature to function properly. Social media features and tools are hosted by a third-party, and your interactions with these



integrated social media features and tools are governed by the privacy policy of the company providing it. To learn more about cookies, please check out our Cookie Policy, found here: [www.zeptolab.com/cookies](http://www.zeptolab.com/cookies).

### **13. Sharing your personal information for business/legal reasons.**

A. Business Transfers. As we continue to develop our business, we may reorganize as a business entity, acquire entities, subsidiaries, or business units, or enter into joint ventures with third-parties. In any of these types of transactions, any information you provide may be one of the transferred business assets (subject to any pre-existing privacy notice unless you consent otherwise). In the event that all or substantially all of our assets are acquired or we merge with a third-party, your information will likely be one of the transferred assets. You understand and agree that we reserve the right to transfer any information collected from you in the case of any such transfer. In such event, we will use reasonable efforts to notify you before information about you is transferred and becomes subject to a different privacy policy.

B. Legal. We may disclose information you provide to respond to subpoenas, court orders, requests from authorities, and other legal process, and to establish/exercise our legal rights. We may also disclose your information to defend against legal claims when we believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request. We may share your information in order to investigate, prevent or take action regarding illegal activities, suspected fraud, and situations involving potential threats to the physical safety of any person, violations of our Terms of Use, or as otherwise required by law.

### **14. How do i access, manage, or update my personal information?**

If you are playing "King of Thieves" and/or "CATS: Crash Arena Turbo Stars" and want to access, manage, or update the personal information that ZeptoLab has collected about you, please check out our FAQ found at <http://zepto.helpshift.com>. For all other Games, please contact us at [privacy@zeptolab.com](mailto:privacy@zeptolab.com).

### **15. For users in the european union.**

A. Legal Basis for Processing. Our legal basis for collecting, using, and sharing your personal information will depend on the purpose for which we use your personal information. Typically, we will rely on the following legal bases for processing your personal information: (i) your consent; (ii) where our processing is in our legitimate interest (e.g. processing for analytics or direct marketing) or in the legitimate interest of our Ad Partners or Service Providers; or (iii) where our processing is necessary to perform a contract with you (e.g. to make the Games or Websites accessible to you). If we rely on your consent to process your personal information, you have the right to withdraw your consent at any time.

B. Your Personal Information Rights. If you would like to exercise your rights of access, rectification, erasure, restriction of processing, data portability, and/or your right to object to the processing of your personal information, please follow the instructions described in Section 14. If you would like to opt-out of your personal information being shared with our Ad Partners, please follow the instructions in Section 5(A) (ii).

C. Transfer of Personal Information Outside of the EU. Because our Service Providers are located in countries outside of the European Union, your personal information will be transferred to other countries that may not offer the same level of data protection as the laws of your country of residence. We rely on model contractual clauses and/or the Privacy Shield certification for such transfers.

D. How to File Complaints. If you believe your rights under the GDPR have been violated, you may lodge a complaint with the supervisory authority of your country of residence. For contact information for your supervisory authority, please [visit here](#).

## **16. Certifications.**

If you have an unresolved privacy or personal data use concern in relation to your use of Cut the Rope, Cut the Rope Free, Cut the Rope: Experiments, Cut the Rope: Time Travel, Cut the Rope 2, Cut the Rope: Magic, <https://www.zeptolab.com>, and/or <https://www.cuttherope.net>, and believe that we have not satisfactorily addressed your concerns, please contact our U.S.-based third party dispute resolution provider free of charge at <https://feedback-form.truste.com/watchdog/request>.

## **17. ZeptoLab's contact information.**

If you have any questions about our Privacy Policy or about our use of your personal information, then you may contact us at:

*ZeptoLab UK Limited*  
*Staple Court, 11 Staple Inn Buildings*  
*London, WC1V7QH United Kingdom*  
[+44 7949 320701](tel:+447949320701)  
[privacy@zeptolab.com](mailto:privacy@zeptolab.com)