Lulo Apps Privacy Policy

Last updated: October 16, 2018

Introduction

This is the Privacy Policy (the 'Policy') of Lulo Apps SARL (a limited liability company incorporated under the laws of France) with its headquarters at 5 chemin du Tanit, bat D, 06160 Antibes, France (hereafter 'Lulo Apps', 'we' or 'us').

This Policy describes the ways in which Lulo Apps and the companies we work with collect and use information about you when you use one of Lulo Apps games and applications (each an 'App' and together the 'Apps') including the game title Classic Words (Free and Plus versions), accessed via mobile platforms (for example, Apple's 'App Store', Google Play, Blackberry World, Amazon AppStore for Android). It also applies to the Lulo Apps websites (Websites), including the one hosted on the classicwords net domain.

If you have any gueries about this Policy, please contact Lulo Apps using our contact details below.

Who this Policy applies to

By downloading and/or accessing any of the Apps or Websites you agree to be bound by this Policy regarding the information collected about you. This Policy applies to people who use the Apps or Websites and people who contact us by email. This includes support emails automatically generated (pre-filled) by the Apps and manually sent by you.

Information Lulo Apps collects and uses when you contact us

When Lulo Apps receives support requests (e.g. complaints or suggestions) by email, we file any relevant document and may retain details of the sender, including some or all of these details:

- Name
- Email

And, in the case of an email generated / pre-filled by an App:

- IP address
- Unique device identifier
- Device model and OS version
- Advertising ID
- Details about the current settings of the app as well your gaming stats
- Technical logs retrieved from the device

Lulo Apps shall retain information in relation to a support request in a secure environment and access to it will be restricted on a 'need to know' basis. Exceptionally, this information might be used after the support request by Lulo Apps in order to give you information about the game (for example, to invite you to be a beta tester of a new feature). You can explicitly refuse to be contacted at any time by sending us an email (see Contact Us). If necessary, some emails may be shared with partners, for the only purpose of troubleshooting. For example, to investigate the source a fraudulent advert with the help of an ad network.

Information collected by third parties when you use the Apps

Advertising:

The Apps may use external services provided by advertising partners (ad networks) to display in-app advertisements. These services collect your device advertising identifier and IP address for frequency

capping, aggregated ad reporting and to combat fraud and abuse. They may also use your advertising identifier to serve personalized (interest-based) ads in the following 2 cases:

Users in the European Union

1. If you have given your consent to view personalized ads inside the App:

On first launch, you will be asked if you accept or refuse to receive personalized ads. You can change this choice at any time in the App preferences.

Other users

2. If you have not enabled "Limit Ad Tracking" or "Opt out of Interest-Based Ads" option in your iOS or Android settings.

If you accept to view personalized ads, the ad services may attach the information gathered from your device (including your advertising identifier) to info gathered from other apps, websites, or via other services, and transfer the info to another provider for the purpose of serving ads relevant to your interests.

If you refuse personalized ads, you will still view contextual ads, unless you choose to pay for an ad-free experience of the App.

A complete list of our advertising partners is provided here: <u>Lulo Apps advertising partners</u>.

Analytics:

The Apps use third party analytics services (Google Analytics, Firebase Analytics and Fabric Answers) which collect application usage information. This information is anonymized, in that it does not contain personal information like your name or email address or unique device identifier. You can opt-out of Firebase Analytics through applicable device settings, such as the device advertising settings for mobile apps.

Crash reporting:

An App may use a third-party service (Crashlytics) to collect reports of crashes and other technical issues. This crash reporting service automatically collects certain information that does not personally identify the user of the App. This information includes, but is not limited to, device state information, unique device identifiers, device hardware and OS information, and information relating to how our application functions.

How Lulo Apps uses information collected from you when you use the Apps

The uses for which we collect and store your information (as described previously, directly, or through third party services) include:

- to operate and improve our Apps, and improve user experience
- to provide technical support and respond to player inquiries
- to deliver advertising within the Apps which is more relevant to you (cf. Advertising section)

Links to third party websites and third-party adverts

Lulo Apps is not responsible for the privacy policies and practices of other sites even if you access them using links or advertisements from the Apps, or Websites.

Accessing and Updating Your Information Held by Lulo Apps

You have the right to request a copy of the personal data that Lulo Apps holds about you and, where necessary, to rectify, block or erase any such personal data which is incorrect or incomplete. You can exercise this right free of charge, once per year, by sending a signed written request to Lulo Apps. Note

that if you have never sent us any support email, we probably don't have any personal information about you.

Contact Us

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices, please send an e-mail to privacy@classicwords.net