



**Last Update: May 25, 2018**

# **Privacy Policy**

Movile ("Movile", "we", or "us") is committed to protecting your privacy. We have created this Privacy Policy to show our commitment to the protection of your privacy while you use any of the PlayKids, PlayKids Explorer, PlayRoom, PlayKids Stories, PlayKids Party, PlayKids Talk, Leiturinha and PlayKids Fly applications (the "Apps") and any services available through or in connection with the Apps, such as our website (the "Subscription Services"). Your use of the Apps and of the Subscription Services is covered by this Privacy Policy and by the Terms of Use.

## **1. WHAT THIS POLICY COVERS**

This Privacy Policy is applicable only to the Apps and to the Subscription Services, and it does not apply to any other applications or subscription services that you may access through the Apps, including but not limited to applications and subscription services accessed via advertisements or connections to third-party content, each of which may utilize data collection, storage, and /or practices and policies that differ considerably from this Privacy Policy.

You shall be responsible for assuring the accuracy of the Personal Information that you present to Movile. Incorrect information will affect your use of the Apps and of the Subscription Services, as well as our ability to contact you using the contact methods described in this Privacy Policy.

If you are accessing the Service from within the European Union (EU) or are an EU citizen, please review the Lawful Bases for Processing Personal Information and Individual Rights sections below for more information on your how your Personal Information will be processed and the rights you have regarding this processing.

## 2. INFORMATION WE COLLECT AUTOMATICALLY

When you download or use our Apps or Subscription Service, we may automatically collect certain information about your use of and your computer's (or other access device, such as a smartphone) interaction with the Apps or Subscription Service ("Device Information"). Even if you do not subscribe to the PlayKids Subscription Service from Movable, we may collect Device Information when you use our Apps and Subscription Service.

### A. What Information is Collected?

We may automatically track and collect the following categories of information when you visit our Apps or use our Subscription Service:

(1) IP address; (2) Device ID; (3) The type of Internet browser or mobile device used; (4) The operating system of your computer or mobile device; and (5) other similar technical information. Device Information we collect automatically will not be linked with any personal information that you provide to us.

### B. How are Cookies Used?

Cookies are small computer files that are transferred to your hard disc and which contain information such as your user name and the activities that you performed while using the Apps and Subscription Services. We utilize cookies to personalize your experience with the Apps and the Subscription Services, as well as to store your login information so that you do not need to re-enter it each time you visit the Apps or access the Subscription Services.

We do not connect the information stored in the cookies to any of your personal information. Some of our partners also use cookies to provide us with anonymous global data and information regarding our users.

We do not have access to or control over these cookies, and our Privacy Policy does not cover the use of third-party cookies.

## 3. INFORMATION YOU PROVIDE TO US

### A. Registration

In order for you to use our Apps or Subscription Services, we may require that you provide information that directly identifies you ("Personal Information"). This includes contact information, such as your first name and last name, your email address, cellular phone number, and, when applicable, account information for effecting charges (credit card number, CVV, etc.).

We shall use the Personal Information you provide to respond to your questions and to send you messages about the Apps, as well as for service maintenance and updates.

### **A. Using the Apps and Subscription Services**

In addition to the Personal Information noted above for registration and sign up purposes, you may provide Personal Information to us while using the Apps and Subscription Services. Parents have the option of uploading a photograph of their child when creating a child profile. If you choose to submit a support inquiry, you may have the option of providing Personal Information such as your phone number or payment information.

## **4. HOW WE USE YOUR PERSONAL INFORMATION**

We may use your Personal Information to send you information about the Apps or the Subscription Services, and to contact you when necessary, including an email to verify your subscription.

We may use your Device Information to personalize and adapt your experience with the Apps and the Subscription Services, and in our communications with you in order to exhibit content that we believe you may be interested in and which may be consistent with your preferences.

## **5. HOW WE SHARE YOUR PERSONAL INFORMATION**

We may share your personal information and data traffic with our partners who assist us through the development of essential services involved in the operations of the Apps and Subscription Services. Our partners shall be obligated to maintain the same security and confidentiality standards that we promise to you in this Privacy Policy. They shall use your personal information only to meet specific business obligations and to provide services involved in the Apps.

Below are categories of recipients of your Personal Information and some examples of the third-parties in that category. If you would like more information on any of these categories or specific recipients, please contact us at: [support@playkids.com](mailto:support@playkids.com)

- User Communication ([Mailchimp](#))
- Ecommerce ([Stripe](#))

- Analytics ([Google Analytics](#), [Flurry](#))

In addition, we may transfer your Personal Information to other companies as a result of a sale, merger, or acquisition of or by Movile. In this case, we shall make all efforts possible to notify you before any Personal is transferred or becomes subject to a different privacy policy. Movile does not share, sell, or rent your Personal Information to third parties for promotional ends.

We reserve the right to disclose your Personal Information if it is demanded by law and when we believe that disclosure is necessary to protect our rights and / or to satisfy a legal procedure, judicial order or a lawsuit.

## **6. LAWFUL BASES FOR PROCESSING PERSONAL INFORMATION**

If you are an individual in the European Union (EU) or an EU citizen, we collect and process data about you only where we have legal bases for doing so under applicable EU laws. This means we collect and process your data only when:

- It is necessary for a legitimate interest (which is not overridden by your individual privacy interests), such as preventing fraud, improving the Website, and increasing the security of the Website and network infrastructure;
- You have consented to this collection and processing for a specific purpose;
- It is necessary to fulfil our contractual obligations; or
- It is necessary to comply with a legal obligation.

Where we rely on your consent to process your Personal Information, you have the right to withdraw or decline consent at any time. If you wish to withdraw your consent, please contact us using the information in the Contacts for Individual Rights Requests section.

Some examples of our legitimate interests and the information being processed include:

- Network and information security (password, IP address, Device ID)
- Customer Support and fraud prevention (name, email address)

- Improving our products and services (hardware information, activity logs)

Where we rely on our legitimate interests to process your Personal Information, you have the right to object. More information on exercising this right can be found in the Individual Rights section below.

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us at [support@playkids.com](mailto:support@playkids.com).

## 7. INDIVIDUAL RIGHTS

We make certain choices available to you when it comes to your Personal Information and any Device Information that can identify you (“Personal Data”). Please review the below information outlining your choices and how to exercise them. We will respond to all requests within a reasonable timeframe. If our full response will ever take more than a month due to complexity or scope, we will notify you of this and keep you updated on our progress.

Review and update your data: You have the right to access and update any Personal Data that we have collected. Some Personal Data, such as the account holder’s name and email address can be found and updated using the account management tools on our website. For any Personal Data beyond this, please submit a request using the contact information at the end of this section. We may request more information to confirm your identity before modifying any Personal Data.

Delete your data: You also the right to have your Personal Data deleted. This is sometimes known as the ‘right to be forgotten’. To request that we delete all Personal Data about you, please submit a request using the contact information at the end of this section. We may request more information to confirm your identity before deleting any Personal Data.

After you delete your Personal Data from our services, we may not immediately delete residual copies from our active servers and may not immediately remove data from our backup systems for archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a

legitimate reason to do so. We may also decline to honor this request in certain specific situations, such as if the data is necessary to comply with a legal obligation or to exercise/defend a legal claim.

**Restrict Processing:** You have the right to restrict how we process your Personal Data in certain circumstances. This is often an alternative to requesting the complete deletion of your data. Rather than requesting we delete all of your Personal Data, you may request that we limit our uses of your Personal Data to specific purposes. You may wish to request we restrict our processing if you contest the accuracy of your Personal Data and we are working to verify this information, or if you want us to retain your Personal Data in connection to a legal claim but cease processing it.

**Data Portability:** You have the right to obtain copies of your data in a structured, commonly used format that you can move your data between our service and the services of others. We may request more information to confirm your identity before providing any Personal Data.

**Right to Object:** You have the right to object to the processing of your Personal Data for direct marketing purposes or when our processing of your data is based on legitimate interests. You may request that we stop processing your Personal Data for direct marketing purposes.

This is an absolute right and we cannot refuse this request. Beyond direct marketing, if you wish to exercise this right, you must give specific reasons why you object to our processing of your data, based on your particular situation. Even after receiving such a request, we may continue processing if it is necessary for the exercise/defense of a legal claim or if we can demonstrate a compelling legitimate ground for the processing.

If any request made under this section is clearly unfounded or excessive, we may reject the request or require a reasonable fee to honor the request. If we decide to reject your request, we will inform you of the reasons for not taking action and provide information on other possible remedies. If we decide that a reasonable fee is necessary, we will promptly inform you and will comply with the request upon receipt of this fee.

## **8. CONTACT FOR INDIVIDUAL RIGHTS REQUESTS**



Please use the below information when submitting a request to exercise any of the above rights. Please do not submit requests across multiple communications channels. We will make all efforts to respond to your request within a reasonable timeframe.

Email: [support@playkids.com](mailto:support@playkids.com)

Physical Mail: 201 S. Biscayne Blvd, #1200 Miami, FL, 33131-4316

If you are an EU citizen or reside in the EU and wish to raise a concern about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority.

## **9. LINKS TO OTHER APPLICATIONS**

Our Apps do not present any type of advertisements or Third-Party advertisements and do not contain links to other applications and services with which Movile and PlayKids is not affiliated ("Third-Party Apps"). Movile will not share your personal information with Third-Party Apps. Movile is not responsible for the privacy practices of Third-Party Apps. Some Third-Party Apps may possess styles and appearances that are similar to our Apps. We ask you to be aware that you may be in a different application, and that this Privacy Policy covers only our Apps. If you decide to utilize Third-Party Apps, we suggest that you read their privacy policies carefully.

## **10. SECURITY**

The Personal Information that we collect about you is stored on a secure, password-protected server. Only authorized personnel have access to your Personal Information. We use cryptography technology that is standard in the industry when receiving and transferring Personal Information. However, despite our best efforts, no transmission over the Internet or cellular phone network, nor any other method of data storage, can be guaranteed to be safe 100% of the time.

## **11. DATA RETENTION**

We may retain your data for the following purposes:

- To develop new features and improve the Apps and Subscription Services;
- To support subsequent customer service inquiries;

- To improve the safety and security of the Apps and Subscription Services; or
- Comply with our legal obligations.

We will retain your information for as long as is reasonably necessary in relation to the purposes for which this data was collected. In many instances, we will retain your data while it is necessary for your use of the Apps and Subscription Services, which may include maintaining this information beyond when you cease using the Apps and Subscription Services.

## **12. OPTIONS FOR ENDING COMMUNICATION**

If you no longer wish to receive communications from Movic, you may change your preferences by following the instructions included in each email or message, or by contacting us at [support@playkids.com](mailto:support@playkids.com).

## **13. DATA TRANSFER AND STORAGE**

The Apps is stored on servers in Brazil. Thus, if you are outside of Brazil, the Personal Information that you provide to Movic shall be transferred to Brazil. Upon providing your Personal Information, you are agreeing both to the transfer of your Personal Information to Brazil and to the storage of your Personal Information in Brazil, as well as to the use of your Personal Information in accordance with the ends for which it was originally collected.

If you are in the European Union (EU), please note that laws governing data collection and use that may differ from Brazilian law and that we may transfer information, including Personal Information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction. You acknowledge that we may transfer your personal information outside of the EU to provide the Apps and Subscription Services according to our contract (e.g., our Terms of Service) and for any other purpose for which you provide consent.

## **14. CHANGES TO THIS PRIVACY CONTRACT**

We reserve the right to alter this Privacy Policy at any moment and at our sole discretion. In the event of any changes to this Privacy Policy,



we shall publish an altered agreement in the Apps that will inform you of these changes and / or we shall send you an e-mail or text message using a Short Message Service (SMS) via cellular phone. This message will notify you of the nature of these changes and provide a link to the new Privacy Policy for your review. We will obtain prior parental consent if any changes we make to this Policy affect users under the age of 13 in a way that requires such consent under COPPA.

The use of the information we collect is always subject to the Privacy Policy that is in effect when this information is collected.

## **15. CONTACT US**

If you have any questions, please contact us by:

**Email:** [support@playkids.com](mailto:support@playkids.com)

**Physical Mail:**

201 S. Biscayne Blvd, #1200

Miami, FL, 33131-4316