

1. Introduction and Applicability of This Policy

1.1. Throughout this document, “Company”, “We”, “Us”, “Our” and “Ours” refer to:

LETEM LTD

1 Arch Makariou III Avenue,
1 st Floor, office 101,
Lakatameia, Nicosia, 2324, Cyprus

Contact E-mail: privacy@findmykids.org

Contact Phone: [+1 \(830\) 410-8165](tel:+18304108165)

The identity and the contact details of Company representative for European Union users:

Alexej Sokolow
Postfach 71 01 31
28761 Bremen

Data protection officer of European Union users

privacy@findmykids.org

1.2 This Privacy Policy describes how We collect, store, use, and manage the personal information you provide to Us or that We collect in connection with <https://findmykids.org/> (the "Site"), official company communities on social media, mobile apps “Findmykids” and “Pingo: Chat with parents” (referred to as the "Applications" and collectively with the Site and all services provided through the Site and Applications, as the “Services”), as well as your choices and rights concerning the collection and use of personal information.

The Privacy Policy is applied to all visitors and users who use the Services (hereinafter – “Users” or “You”). Some of our Services are intended for children. This privacy policy contains a section on Children's Privacy. However, some of the other sections of this privacy policy apply equally to children's personal information and the personal information of adults. Whenever this is the case, we explicitly state that.

This Privacy Policy is also part of the Terms of Use located at <https://findmykids.org/docs/terms-of-use/> (the “Terms of Use”), which You, or if you have not reached the age of majority in your jurisdiction, a parent or legal guardian on Your behalf, must read and accept. The Terms of Use explain your rights and the responsibilities of the Company when you use the Services. Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use.

Whenever we refer to a child, we mean a child under the age of 13, for US users, and a child under the age of 16, for EU users.

Before accessing or using Our Services, please ensure that You have read and understood how We collect, store, use, and disclose Your personal information as described in this Privacy Policy.

2. Data We Collect and Receive

2.1. In order to provide You with Our Services, We may collect or receive data, which may include personal information voluntarily provided during the registration process, subscription to the Service, publication of materials or information collected automatically during the course of providing the Services.

2.2. We collect the following types of information about You and Your child:

2.2.1. Registration and Account Data

The “Findmykids” app, which is intended for adults only, allows Users to create a profile. When You create such a profile, We may collect Your personal information, such as email address, gender, or cell phone number. We also may collect Your general location data such as country or region (We do not collect your precise geolocation).

The “Pingo: Chat with Parents” app is intended for children. It can be set up by an adult or a child. If the app is set up by a child, We first request a parent's code from the “Findmykids” app. These apps need to be used together. The only personal information we ask for within the “Pingo: Chat with Parents” is the child's age.

When You as a parent set up the child's “Pingo: Chat with Parents,” Your parental “Findmykids” app is connected to that child's phone, and You as a parent may create a child's profile within the “Findmykids” app by providing the following personal information:

- Child's nickname. This nickname is not displayed publicly.
- Avatar picture. Only a picture that does not identify the child can be used. The Company does not store photos of the child on its server, and only the parent is allowed to access this data.
- GPS watch photos. The Company does not store photos of the child on its server, and only the parent is allowed to access this data.
- We may also collect information from your Contact list for the purposes of setting up a White list option and filling a contact list, choosing numbers to control the watches, and SOS numbers.

2.2.2. Communication Data

When You communicate with Us or submit a report about problems with the Services, post any content or messages, or provide any other information within the Services, We may process all of this information. This data may include:

- data that You post on the Services;
- data sent through "Pingo: Chat with Parents";
- data You provide through our support channels.

Children do not have the ability to contact us from within the "Pingo: Chat with Parents" app.

2.2.3. Data Collected Through Use of the Services

2.2.3.1. When You or Your child use any of Our Services, the following types of information may be processed:

- general location data, which includes your country, region, city (includes your precise location data);
- language set up on your device;
- data about Your use of the Services;
- payment data, when You purchase any Services from Us, including information necessary to process Your orders with the relevant payment provider, which may include the amount of any transaction, but WILL NOT INCLUDE Your name, financial information, or cardholder data, which will only be submitted directly to the payment service provider under secure protocols; You can find further information in the current data protection guidelines of the respective payment providers. When You make in-app purchases within the mobile application, 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 Store or Google Play) or Your platform's payment processor.

2.2.3.2. We may collect the following types of personal information regarding child users of the "Pingo: Chat With Parents" app:

- Geolocation (precise geolocation): we collect and use the unique user ID and location of the mobile device on which the "Pingo: Chat With Parents" app is installed using GPS, WiFi, or wireless triangulation in order to get the location of the mobile device to provide our Services. We only store the geolocation data as long as it is reasonable to provide the Service, and then We delete the geolocation data related to Your profile in the "Findmykids" app. The Company may maintain geolocation data for a longer period of time only in order to analyse cumulative trends and indicators (improvement of our Services). During the app's set up, We will ask You whether You want to turn the geolocation tracking on. You can later change your choice within the settings of the device.
- Sound around the child's device per request of the parent: you as a parent can choose to listen live to your child's device's surroundings for 20 seconds (if You are within 2 meters of Your child's phone). Your child needs to have the "Pingo: Chat With Parents"

app installed. Listening and recording are allowed only for the users with the “Findmykids” app installed and connected with the child's profile. The child is notified that they may be recorded. This information is accessible from the settings of the “Pingo: Chat With Parents” app.

- data on installed applications (name of the installed application, application package ID, date of installation of the application, time of use of the application). This information is necessary for the provision of the Service. With this function the user of the Findmykids can limit the time of use of the child's device. For this purpose, We convert the names of the installed application, application package ID, the date of installation of the application, and the time of application use into user-friendly graphs to enable the parent to limit the time of application use by the child.

- Fitness data or activity recognition data: this information may be displayed within the “Findmykids” app connected with the child profile.

- Data about features that users use in the app.

- Data about users' taps and swipes in the app which they make by interacting with the application interface.

- Screenshots captured during the app usage.

- Virtual device identifier.

The Company does not store sound around the device or audio data, usage statistics, fitness data, or activity recognition data on any servers. Only the parent connected to the same child profile is allowed to access this information within their “Findmykids” app.

2.2.4. Data Collected Automatically via Cookies and Related Technologies

When you visit our website or use our mobile software, We and Our business partners may collect certain data about your PC or device using technologies such as cookies, web cookies, log files, or any other tracking/recording tools. The information We collect using the tracking technologies includes but is not limited to the IP addresses, browser information, links to/exits and URLs, streaming data and information regarding how you interact with the web links, website, mobile software or Service, domain names, landing pages, page views, cookies data which allow us to uniquely identify your browser and monitor the behaviour of your browser at Our website, type of mobile device or other permanent identifiers. Some or all of this data may be combined with other personally identifying information specified above.

When You access our Service via a mobile device, We may receive or collect and store unique identification numbers associated with Your device or Our mobile app (including, for example, UDID, a unique identifier for advertisers ("IDFA")) device type, model and manufacturer, brand and model of the mobile operating system.

We may use first-party cookies that belong to us and that we place on your device and third-party cookies that another party places on your browsing device when You visit our site. Third parties setting cookies on Our website will be providing a service to Us or a function of the Site, but We do not always control how third-party cookies are used. You should check the third party's website for more information about how they use cookies.

Please see the [Cookie List](#) for more information about the cookies we use on Our website, and how long they will stay on Your device.

Cookies or similar technologies stored on your computer or device through which You use the Services have amongst others but without limitation, the following functions: Authentication. If you're signed in to our Services, cookies help us show you the right information and personalize your experience.

Security. We use cookies to enable and support our security features, and to help us detect malicious activity.

Preferences and Features. Cookies or similar technologies can tell us which language you prefer and what your communications preferences are. They can help you fill out forms on our Sites more easily. They also provide you with features, insights, and customized content.

Marketing. We may use cookies or similar technologies to help us deliver marketing campaigns and track their performance. Similarly, our partners may use cookies to provide us with information about your interactions with their services and action tags to measure advertising effectiveness and allow more effective targeted advertising, but the use of those third-party cookies would be subject to the service provider's policies. We do not use or share the child's personal information for the purposes of targeted advertising.

Performance, Analytics, and Research. Cookies or similar technologies help us learn how well our Sites and Services perform, diagnose or fix technology problems reported by the users or developers. We also use cookies or similar technologies to understand, improve, and research products, features, and services, including to create logs and record when you access our Sites and Services from different devices, such as your computer or your mobile device.

We may use third-party analytics providers software to allow us to better understand the functionality of our software on your device, including but not limited to, Google Analytics, Firebase, Facebook Analytica (collectively "Third Party Analytics Providers"). This software may record information such as how often You use the Services, the events that occur within the Services, aggregated usage, performance data, and where our Software was downloaded from. We do not link the information we store within the analytics software to any personal data You submit within the Services.

The following is the non-exhaustive list of third parties that we use for analytics:

Paymentwall (USA)

We are using the aforementioned services for processing transactions. For more information about their privacy practices please see <https://www.paymentwall.com/privacypolicy>.

Firebase (a country of the owner of this service depends on your country)

Firebase helps us understand clearly how Users behave, which enables You to make informed decisions regarding app marketing and performance optimizations. For more information about Firebase privacy practices, please see <https://firebase.google.com/terms/analytics>.

Google Analytics (USA)

Google Analytics collects information such as how often Users visit this Site, what pages they visit when they do so, and what other sites they used prior to coming to this Site. Google's ability to use and share information collected by Google Analytics about your visits to our Services is restricted by the Google Analytics Terms of Use (as amended for government websites) and the Google Privacy Policy. You can prevent Google Analytics from recognizing You on return visits to this Site by disabling cookies on your browser or mobile device. For more information about Google Analytics, please see the Google Privacy (<https://policies.google.com/privacy?hl=en>). To prevent Google Analytics from using your data through a web browser, you can get the Google Analytics Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout/>).

Facebook Analytics (a country of the owner of this service depends on your country)

Solution for analytics that helps to understand how You use our Services. For more information about Facebook Analytics privacy practices, please see the https://www.facebook.com/full_data_use_policy.

AppsFlyer (USA), Adjust (a country of the owner of this service depends on your country)

We are using the aforementioned services for attribution and marketing analytics services that allows us measure and analyze the effectiveness of our marketing campaigns by understanding which marketing campaigns contributed to the installation of our mobile applications and such other conversion metric; and measure and analyze certain events and actions within our applications, such as in-app purchases made by End Users. For more information about AppsFlyer privacy practices, please see the <https://www.appsflyer.com/legal/services-privacy-policy/> and <https://www.adjust.com/terms/privacy-policy/>.

2.2.6. Anonymous data

We will also collect anonymised details about visitors to and use of Our Services for the purposes of creating aggregate statistics or reporting purposes. However, no single individual will be identifiable from the anonymised details we collect for these purposes.

2.2.7. Sensitive Information

We do not collect or process any sensitive information, such as information related to the racial or ethnic origin, political opinions, religious beliefs, physical or mental health or condition, crime or court records, etc.

3. Children's Personal Data

3.1. US child users

3.1.1. The Company takes special precautions to protect the privacy of children. The Company does not knowingly collect personal information from children under the age of 13 without verifiable consent of a parent or legal guardian. Some of our Services are intended to be used by children under 13. In that case, it's only with significant parental involvement upon the setup of the Service (e.g., the connection of the “Pingo: Chat with Parents” app with the parental “Findmykids” app) and receipt of verifiable parental consent.

3.1.2. If the Company learns that we have inadvertently collected personal information of a child without parental consent, we will take appropriate steps to delete this information as soon as possible. Although this is highly unlikely to happen, if you are a parent or guardian and discover that your child under the age of 13 has a registered account with our Service without your consent, please alert us immediately by emailing privacy@findmykids.org so that we may delete that child’s personal information from our systems and terminate any account your child has created with us.

3.1.3. Verifiable parental consent is obtained using the email plus consent mechanism under COPPA. We will request that You as a parent provide your email address, where we will send you an email to verify your email address and a consent email. You will be asked to either open a link sent in the consent email or add a verification code on your device during the setup of the “Findmykids” app. The “Pingo: Chat with Parents” app cannot be used before you enter your code accessible in the “Findmykids” app.

We will then send you one more email to confirm that We have received your consent, with information on how to revoke it.

3.2. All child users

3.2.1. Information sharing. The Company may share or disclose a child’s personal information with Our third-party service providers and business partners as described in our Privacy Policy. However, we do not use or share personal information collected from the accounts of children under 13 for marketing or advertising purposes, nor permit our third-party partners to collect and use such information for advertising purposes. Please review the section of our Privacy Policy called “Who We Share Your Data With” to learn more about how we share information with our service providers, partners, and others.

3.2.2. Sharing information with other users. The child's profile information and geolocation, sound around the device or audio data, usage statistics, fitness data, or activity recognition data will be shared with the parent through the "Findmykids" app connected to the same profile as described in this Privacy Policy.

3.2.3. If You would like to review or delete any personal information We have collected from Your child, or to withdraw permission for us to collect any information from Your child, please contact us at privacy@findmykids.org. Please also review the section of the Privacy Policy called "Your Rights and Options" to learn more about how you may control or turn off certain data collection by the Service.

4. How We Use Data

4.1. To Provide the Services to You

To provide the Service to You and to perform Our contract with You, we use Your information, which is necessary:

1. ● to register and administer Your User Account, and to verify Your details;
2. ● to provide You with the Service upon Your request;
3. ● to verify and confirm Your payments;
4. ● to communicate with You including via email or push notification about Your account or transactions with Us and send You information about features on Our Services or changes to Our policies;
5. ● to provide support including, but not limited to, product updates, product patches, fixes, and other similar communications;
6. ● enable You to communicate with Your child.

4.2. To make the Service more suitable for Our users

To provide a great Service to Our users, We have a legitimate interest in collecting and processing the necessary information to

1. ● update and develop User profiles;
2. ● develop and improve the Service and User experience;
3. ● manage our relationship with you;
4. ● customize your Service experience;
5. ● respond to your comments and questions and provide User support;
6. ● notify you and provide you with information about the features of our Services, new releases and service developments, and to advertise our products and services;

7. ● provide you with special offers inside the Service as well as in other websites and services, and by email;
8. ● send you related information, including via email or push notification, such as updates, security alerts, and support messages.

You may opt-out of receiving promotional communications from us. To find out how to do this, please refer to section 10.6. (Opt-Out of Direct Marketing).

4.3. To Keep The Services Safe And Fair

In order to keep the Service and its features safe and fair, to prevent and fight fraud and cheating, and to ensure acceptable use, we have a legitimate interest in processing the necessary data to

1. ● analyze and monitor the use of the Services;
2. ● take action against fraudulent, cheating, or disruptive Users;

If the data can be used to prove that cheating, fraudulent activity, or Terms of Use violation has occurred, we will further store the data for the establishment, exercise, or defense of the legal claims for the duration of the applicable statute of limitations.

4.4. With Your Consent

4.4.1. We are not required to obtain Your consent for most of the processing activities that we undertake in respect of Your own personal information. For more information on how we receive verifiable parental consent for the collection and processing of children's personal information see section 3 above.

We may, however, need Your consent for certain processing activities. If we need Your consent, we will notify You of the personal information We intend to use and how We intend to use it. With Your consent, we may process Your information for additional specific purposes.

4.4.2. If you have consented to Our use of information, You have the right to change Your mind at any time and withdraw your consent, but this will not affect any processing that has already taken place. To find out how to withdraw Your consent please see section 10.7 (Withdraw consent).

Where we are using your information because we have a legitimate interest in doing so, You have the right to object to that use. However, in some cases, this may mean that You will no longer be eligible to use the Services.

5. Who We Share Your Data With

5.1. We share information we collect about You in the ways discussed below and only when necessary for the performance of a contract with You, compliance with a legal obligation to which we are subject or based on our legitimate interests. We may share

Your with third-party service providers that perform services for us or on our behalf, which may include providing payment, email services, fraud prevention or analytic services, or other service providers as specified below. We are not in the business of selling information about You to advertisers or other third parties. While a third party may have access to Your personal data in connection with the performance of services for the Company, it may not use such information for any purpose other than providing its services.

5.2. Hosting Services: we may use third-party companies to host information or provide the infrastructure that helps with the delivery of Our Services. Such partners include: Selectel Ltd (<https://selectel.ru/en/about/documents/>), Hetzner Online GmbH. (<https://www.hetzner.com/legal/privacy-policy>) and Google Cloud Platform (<https://policies.google.com/privacy?hl=en>).

5.3. Customer Support Services: we engage third parties to help Us provide customer support for some territories and products. Such companies may have access to Your personal data, including personal data that You may provide in your customer support requests. Such partners include: Intercom, Inc. (<https://www.intercom.com/legal/privacy>)

5.4. Email service providers. We use the Rocket Science Group LLC (“Mailchimp”) <https://www.intuit.com/privacy/statement/> and eSputnik Inc. partners to send You email notifications; these partners may have access to Your email address.

5.5. Advertising and Advertising Measurement Partners: we may share Your personal information in order to facilitate targeting, delivery, and measurement of online advertising on third-party services, or otherwise facilitate the transmission of information that may be useful, relevant, or of interest to you. Such partners include: Facebook Inc. (<https://www.facebook.com/privacy/policy/>). We do not share children's personal information for these purposes.

5.6. Improving our service: bugs and crashes analysis, interaction with ‘Pingo: Chat with parents’ app and enhance, maintain accessibility, modify or improve the app for the benefit of all users. For this sake we engage UserX Analytics (<https://userx.pro/privacy>) provided by BUMPIN L.L.C-FZ.

All collected data are anonymized on the side of end-user devices and does not contain any personal or financial information, other sensitive data, or user-generated private content. All transmitted data doesn’t contain any information resulting from the device camera, microphone, or other user inputs in the application. All transmitted data are protected by ssl encryption.

Sharing anonymous information: we also may share with third parties anonymous or aggregated information or other data that does not directly identify You, such as to show trends about the use of the Services. We may share aggregate or anonymous

information about You with advertisers, publishers, business partners, sponsors, and other third parties. We may also allow Our third-party advertisers to collect anonymous information and aggregated information within the Services and they may then share that information with Us. Our advertisers may collect this information through the use of tracking technologies like cookies and web beacons. This enables our advertisers to develop and deliver targeted advertising in the Services and on the websites of third parties so that they can try to serve You with advertisements for products and services that are most likely to be of interest to You. Advertisers will also use this information to monitor, improve, or modify their operations.

5.7. Publicly available information: Our Sites may offer publicly available chats, forums, and blogs that are viewable by others. Please note that You post publicly available information at your own risk. We are not liable for any information that You voluntarily choose to be public through such and/or other explicit actions. You should be aware that any information you provide on these communication services—including your Account information—may be read, collected, and used by any member of the public who accesses these communication services. We urge you to consider the sensitivity of any information you input into these Services. To request removal of Your personal information from publicly accessible websites operated by Us, please contact us as specified below. In some cases, we may not be able to remove your information, in which case we will let You know if we are unable to, and why.

5.8. Change of control: we may share your data as part of our company's sale, merger or change in control, or in preparation for any of these events. Any entity that buys Us, or part of Our business, will have the right to continue using Your data, but only in the manner set out in this Privacy Policy, unless You agree otherwise.

We reserve the right to disclose your personally identifiable information as required by any law and also when we believe that disclosure is necessary to protect Our rights and/or to comply with judicial proceedings, court orders, or legal process.

6. Third-Party Websites and Services

6.1. Third parties may collect Your information. There are a number of places on or through the Services where You may click on a link to access other websites, services or web resources that are not affiliated or connected with Us and do not operate under this Privacy Policy. For example, if You click on an ad, you may be taken to a website that we do not control. These third-party websites may independently collect information, including Your personal information, from You. We advise you to check the privacy policies of all third-party websites you visit.

7. How We Protect Your Data

7.1. The Company takes precautions - including legal, organizational, administrative, technical and physical measures in order to protect the personal data of the User,

including child User, from any unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties. In order to make sure that Your and Your child's personal data is safe, we communicate confidentiality and security standards to the Company's employees and strictly monitor the implementation of confidentiality measures within the Company.

8. Storing of Your Data

8.1. We do not store personal data that can be used to identify a User beyond the time period necessary to complete the function for which information was collected. We store your personal data for as long as Your User account is active, or as long as is needed to provide You with the Service. This also applies to data of child Users.

Note that if you ask us to remove Your personal data, we may retain your information as necessary for our legitimate business interests, such as to comply with our legal obligations, resolve disputes, and enforce our agreements.

8.2. Storing of the information for marketing purposes: If you have elected to receive marketing notifications from Us, we store information about Your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services.

We store information derived from cookies and other tracking technologies for a reasonable period of time from the date when such information was created and in accordance with conditions provided in section 2.2.4. (Data Collected Automatically via Cookies and Related Technologies).

9. International Data Transfers

9.1. Our Service is global by nature and Your and Your child's data can therefore be transferred to anywhere in the world. We transfer, process, and store Your information outside of Your country of residence, to wherever We or Our third-party service providers operate for the purpose of providing you the Services. Whenever we transfer Your information, We take steps to protect it.

9.2. International transfers to third parties. Some of the third parties described in this privacy policy that provide services to Us under contract, are based in other countries that may not have privacy and data protection laws equivalent to those of the country in which you reside. When we share the information of customers in the European Economic Area or Switzerland, we make use of the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks, European Commission-approved standard contractual data protection clauses, or other appropriate legal mechanisms to safeguard the transfer. We will provide you with a copy of the standard data protection clauses upon your request.

10. Your Rights and Options

10.1. You have certain choices available to You when it comes to your information. Below is a summary of those rights, how to exercise them, and any limitations.

10.2. Your requests and choices may be limited in certain cases, such as when fulfilling Your request would reveal information about another person, or if You ask to delete information which We are permitted by law or have compelling legitimate interests to keep.

10.3. Right to Know Your Personal Data Processed (Right of Access)

If you request, upon verification of your identity, we will provide you a copy of your personal data in a structured, electronic format. Below, we describe the processes for making these requests. You may contact us as explained in section 12 (Contact Us) to request assistance.

10.4. Change or Correct Your Personal Data (Right to Rectification)

If available, you can edit some of your personal data through your account. You can also ask us to change, update, or fix your data in certain cases, particularly if it's inaccurate, by contacting us as explained in section 12 (Contact Us).

10.5. Delete Your Personal Data (Right to Erasure):

You can ask us to erase or delete all or some of your personal data (e.g. if it is no longer necessary to Provide Services to you). As a result of deleting your Account, you will lose access to most Services, including the Account and service-related information linked to the Account and the possibility to access the services for which you are using the Account. Please note that once your Account has been deleted, you will lose your user history and all related information.

10.6. Opt-Out of Direct Marketing: You can also opt-out of our use of your information for marketing purposes by following instructions in promotional communications or by contacting us, as explained in section 12 (Contact Us). When you make such requests, we may need time to investigate and facilitate your request. To change or delete push notifications, visit the settings section on your device and select the appropriate setting, or change the settings on your browser if you are accessing any of our websites. You can also stop receiving promotional emails from us by clicking on the "unsubscribe" link provided in such emails. You cannot deactivate the messages related to the functionality of the Service (for example, account verification, notification of parental consent, order confirmation, change or update of the Service features, technical and security notifications).

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).

10.7. Withdraw Consent: You may withdraw consent where the processing of your personal information is based on consent, by contacting us as explained in the section "Contact us." If you withdraw your consent, it will not affect the lawfulness of processing based on your consent before its withdrawal.

10.8. In most instances, we will respond to all requests within one calendar month. If we are unable to deal with your request fully within a calendar month (due to the complexity or number of requests), we may extend this period by a further two calendar months. Should this be necessary, we will explain the reasons for such a delay. If you make your request electronically, we will, where possible, provide the relevant information electronically unless you request otherwise.

10.9. You have the right to complain to the Data Protection supervisory authority for unresolved complaints.

10.10. European Union users have additional specific rights:

10.10.1. Request That We Stop Using Your Data (Right to Object): Where the processing of your Personal Data is based on legitimate interests, you can use your right to object at any time. If you object, we will no longer process your Personal Data unless there are compelling and prevailing legitimate grounds for the processing or the data is necessary for the establishment, exercise, or defense of legal claims.

10.10.2. Data Portability: Data portability is the ability to obtain some of your personal information in a format that you can move from one service provider to another (for instance, when you transfer your email address to another carrier). Depending on the context, this applies to some, but not to all of your data.

11. Changes to This Privacy Policy

11.1. We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice within the Services or by sending you a notification. We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy.

11.2. For the users in the USA, Wee 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.

12. Contact Us

12.1. If you have any questions regarding the Company's Privacy Policy or the processing of data by the Company, you can contact us at:

LETEM LTD

1 Arch Makariou III Avenue,

1 st Floor, office 101,

Lakatameia, Nicosia, 2324, Cyprus

Contact E-mail: privacy@findmykids.org

This privacy policy and personal data processing latest modification is done on March 11, 2022