## **AREAL STUDIOS PRIVACY POLICY**

#### **ADS**

We promote other publisher's apps. We may share information we collect from you to our advertising partners and they can reuse such data for targeted advertising. We or our advertising partners may display interest-based, or retargeted, ads ("IBA"), but only for the device IDs that have passed the age gate and have not opted out of IBA. By using our Apps, you give us consent to transfer your data as stated below.

We may pass information we collect from you such as technical information, advertising and application usage information (for example if a device has clicked on a sports ad within our Apps, for more information please see Information and Data We Collect from You Section of this Privacy Policy) as well as age information to our advertising partners and they can reuse such data for targeted advertising. We allow our partners to serve targeted third party advertisements or other content. They may attach the information gathered from our App to info gathered from other apps, websites, or via other services, and then build profiles and transfer the info to another provider. By doing so the other provider may receive or gather information about you and use the information for displaying targeted ads. Advertisers may choose their audience by location, demographics, likes, keywords, age & gender, interests, behaviors, connections and any other information. We cooperate with several providers of IBA that are listed herein in subsection a).

You have an option to opt out from sharing your information and data for the purposes of interest-based advertising at all times. When you opt out, you will not stop receiving ads, they just won't be based on topics you like, your interest, behavior, demographics, etc. You can opt out by choosing one of the following options (for more information please read the "Opt Out" Section of our Privacy Policy):

- a) Via third party IBA provider:
  - Google (AdMob): https://www.google.com/ads/preferences/html/mobile-about.html;
  - Unity Ads: https://unityads.unity3d.com

If you choose to opt out by following one of the third party IBA provider's opt out mechanism, you should stop receiving interest-based and targeted ads via the selected IBA provider, but you may continue to receive interest-based or targeted ads through other IBA providers. For opting out from receiving interest-based or targeted ads through all IBA providers, please see opt out options b) below.

b) Via "Do Not Track Settings" in mobile phone:

Turn on "Opt Out of Interest-Based Ads" on your Android device.

# **ABOUT US AND THIS PRIVACY POLICY**

As used in this Privacy Policy, "AREAL STUDIOS", "we", "us" or "our", "ours" refers to Areal Studios.

This Privacy Policy is part of and incorporated by reference into the End User License Agreement (the "EULA") governing the use of all "AREAL STUDIOS" branded software applications (the "App/s"), which may operate on any type of computing device (including without limitation, a mobile device), and applies to your use of the App. This Privacy Policy covers how we collect, use, disclose, transfer and store information received about you and/or information received about your computing device through your use of the Apps.

By using our Apps you specifically consent to the collection, use and disclosure of your information (including personal information) in accordance with this Privacy Policy. We may receive and/or you may be asked to provide your information (including personal information) any time you are in contact with us or use the Applications. As described in greater detail below, we may share this information (including personal information) with our affiliates and with third party partners (as defined below) and use it in ways consistent with this Privacy Policy. We may also use your information (including personal information) together with other information to provide and improve products, services, content, and advertising.

For general information please feel free to contact us via arealstudiosx17@gmail.com .

# INFORMATION AND DATA WE COLLECT FROM YOU

#### 1. Technical Information and Data

We collect technical data necessary for you to use our App and additional technical data that enables us to maintain and analyze the functioning of the App, to personalize the content of the App, and to display advertisements.

We automatically obtain certain information about your computing device, including:

- IP address; Country code;
- IDFAs, IDFVs, Advertising IDs;
- Language; Locale (specific location where a given language is spoken);
- Time zone, session start/stop time,
- Network status (WiFi, etc.), browser plug-in types and versions;
- User agent string (UA), platform, SDK version, timestamp;
- Technical device information (e.g. device model and name, operating system name and version, CPU information, storage size, screen size, firmware, software, mobile phone carrier, Internet service provider, API key identifier for application, International Mobile Equipment Identity (IMEI) on Android, Android ID, Android Serial No);

Additionally, for playing video advertisements through a video platform provider, we may collect additional information about your device, such as:

- "do not track" flag;
- page URL;
- Iso code of the country set on device;
- device date;
- whether Limit Ad is enabled or disabled;
- type of device (tablet or not).

## 2. Advertising and Application Usage Information and Data

When you use our Apps, we may collect additional information by using device identifiers that permit identification of your device. Such information is used for advertising and analytics purposes.

The information collected includes:

- Which advertisements are shown;
- Length of time an advertisement is visible and the size of the advertisement;
- · Advertisement response (if any), including clicks on ads;
- Angle of view;
- Application usage information, (how often you use the app, for how long you use the app, the events that occur within the app, in-app location, in-app purchases you make and their value, aggregated usage, performance data, lifetime value of user etc.).

#### 3. Classical Personal Information

We do not collect any personal information about you through our Apps, with the sole exception of persistent identifiers (such as IDFA, IDFV, Advertising ID, IP address). Persistent identifiers are identifiers that do not identify you personally but may uniquely identify your device. Some legislation (such as US) may treat such information that uniquely identifies your device as personal information.

We may ask you to submit and we may process other non-personally identifiable information that may be personal to you such as your age range, year of birth and gender, provided that year of birth and gender information is collected solely for users who have passed the age gate in our Apps. We will use such information to personalize the content of the App, and for users who passed the age gate and have not opted out from behavioral advertising we may use such information to display targeted ads. You can opt out from receiving targeted ads by choosing one of the options described in the "Opt Out" Section of our Privacy Policy.

When you voluntarily contact us directly, we may collect information about you that you provide us (such as your name and surname, email address). We will use such contact information only for the purpose for which you provided it to us. We will not share this information with third parties.

If you wish to delete your contact information that we received from you when you contacted us, please send an e-mail to arealstudiosx17@gmail.com and your contact information will be deleted from our database.

## HOW WE USE YOUR INFORMATION

#### 1. In General

We use the information we collect about you/your device to deliver services to you and to operate our business. Such use by us and by our Partners may include:

- Delivering our services: developing, delivering and improving our products, services, and
  content, tailoring our products and services, providing software updates and product
  support, understanding and analyzing trends in connection with usage of the Apps,
  administering the Apps, and customer communications.
- Displaying advertisements: displaying third party advertisements in our Apps and showing advertisements for our Apps in other publisher's apps. Please see more in Advertising Section of this Privacy Policy.
- Tracking and fraud prevention for advertising purposes: for some of our Apps we use
  third party services for tracking and fraud prevention for advertising purposes and for
  privacy compliance purposes. Please see more in Tracking Section of this Privacy Policy.

#### 2. Game Notifications

We have one type of notification in our Apps - local notifications. Local notifications are contextual and sent from the device.

For the restriction on the usage of information please see 'Children's Privacy' Section of this Privacy Policy.

# HOW WE MAY SHARE YOUR INFORMATION TO THIRD PARTIES

We must therefore share collected information with third parties, including analytics providers, tracking providers, third party advertising providers and other third party service providers that support the Apps (collectively referred to as "Partners"). We may share information that can be used to personally identify your device (e.g. persistent identifiers such as IDFA, IDFV, advertising ID and IP address) for the purposes of delivering our services, displaying advertisements, conducting analysis and research and for measuring our and our Partners' advertising campaign performance. We may share such information to:

- Our analytics providers: Additionally, we have also integrated Google Play Developer Console data like Impressions, Downloads, and Traffic Sources into a Google Analytics account to see how many times people viewed or downloaded our apps from Google Play. The device data we share with such providers are encoded. The providers may assign a random ID to these data and they are not able to match it back to You. Third party analytics providers have the right to process the data in accordance with their privacy policies (http://www.google.com/intl/en/policies/privacy/#nosharing) and such collection and processing is limited to the disclosure in aggregated manner, for the purposes of showing trends about the use of their services, for advertising services and marketing purposes. We can aggregate the data for benchmarking feature.
- Our cloud service providers: We store information we collect from you on servers
  provided by our third party cloud service providers such as Google Cloud Platform and
  Google's Android Backup Service;
- Third party advertising partners: We have contracted with certain third party advertising
  networks that assist us in delivering advertising to you that allows us to continue offering
  the Apps for free. Please see more in Advertising Section of this Privacy Policy.
- Advertising partner's third party tracking provider: For some Apps we may allow our
  advertising partners to track impressions, clicks, installs or other advertising campaign
  performance indicators through their tracking providers for the purposes of measuring
  their advertising campaign performance. Please see more in Tracking Section of this
  Privacy Policy.
- Other third party service providers: For some Apps we use Unity Software to develop such Apps. For the data processing by Unity please see Unity's privacy policy available at https://unity3d.com/legal/privacy-policy.

We may contract with additional Partners or change existing Partners in the future to perform any services in connection with the Apps. These changes shall be updated twice a year or promptly in case of material changes in our data processing practices.

We reserve the right to disclose your information (including personally identifiable information) in response to law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations, users or user experience. Additionally, in the event of a reorganization, merger or sale we may transfer any and all information (including personally identifiable information) we collect to the relevant third party.

For any additional questions about third party information collection please refer to arealstudiosx17@gmail.com.

# HOW OUR PARTNERS MAY USE YOUR INFORMATION

We strive to adhere to the generally accepted industry practices regarding the collection and the usage of information by our Partners and to limit their usage to the services they provide for us. They adhere to this Privacy Policy, but in some cases we must use their privacy policies.

We strive to commit our Partners to using the information solely for the purposes as stated in this Privacy Policy. Notwithstanding the above, we cannot guarantee that our Partners will adhere to the contractual obligations or acceptable business practices. While we strive to protect the information provided to our Partners, we have no direct control over their use of the collected information and therefore you acknowledge that we are not liable for any third party privacy breach and that our liability for our Partner breaches is limited to the amount we can receive as indemnification from our Partners (legal costs exempted).

Some of the Apps allow you to submit content generated in or by the Apps to third party sites like Google Play Games. These submissions follow the information transfer protocols of such third parties, which are designed to enable content sharing with such third parties.

## **ADVERTISING**

When you use our Apps we may display contextual advertisements to you. In order to enable advertising we allow our advertising partners to collect online identifiers (such as Advertising ID on Android and IDFA on iOS) that might be considered as personal information under some legislations, but they should use it solely for the purposes of contextual advertising. For any other purposes they should use the information solely on anonymized and aggregated basis.

For some territories, we may use and share with our advertising partners technical and advertising and application usage information we collect from you (please see Information and

Data We Collect From You Section of this Privacy Policy) to enable our advertising partner to deliver, target and optimize third party advertising in our Apps, so that the advertisements you see are more relevant to you and are based on your app and device usage, online behavior and interests (this is commonly referred to as online behavioral or interest based advertising, i.e. IBA). In addition, we may use and share such information with our advertising partners to target and optimize our advertising and promotions in our and other publisher's apps.

We will always follow applicable legislation and accepted market practices; thus, we will not use and share information for the purposes of behavioral advertising for users who did not pass the age gate in our Apps and for those who opted-out of IBA. For more information on behavioral advertising and our IBA providers please see Interest-Based Ads Section of this Privacy Policy. For opting out from sharing your information and data for the purposes of behavioral advertising please visit Opt-Out Section of this Privacy Policy.

## **TRACKING**

When you use the App, we or third parties operating the advertisement serving technology may use information logged from your device using SDKs, cookies, web beacons and other technologies to ensure that appropriate advertising is presented within the App and to calculate the number of unique and repeat views of advertising.

For some of our Apps we use third party tracking and data collection tools from our service providers for the purposes of tracking performance, ad visibility and privacy compliance of third party SDKs in our Apps.

In addition, our Partners may use their own tracking technologies (including and without limitation: SDKs, cookies, Web beacons, HTTP cache, local shared objects and other technologies) in order to track impressions, clicks, installs or other advertising campaign performance indicators for the purposes of measuring third party advertising campaign performance.

## THIRD PARTY SOCIAL NETWORKS

#### 1. Connecting to Third Party Social Networks

Some of our Apps use third parties' services such as Google Play Games Service, Facebook. Such Apps enable you log in to your Third Party Social Network account to connect to our App by using the "Log in with »or "Connect to" feature in our App. You may also share the content you created within the App on Third Party Social Networks. By logging in to your Third Party Social Network account to connect to our App or by using the App to share content on such Third Party Social Network, you are authorizing us to collect, store, and use any and all information, in accordance with this Privacy Policy, that you agreed that such Third Party Social Network could provide to us through the Application Programming Interfaces ("API"). You authorize us to do so when you "accept" or "allow" (or similar terms) connection of one of our Apps to such Third Party Social Network. The information you allow us to access varies by App, and it is affected by the privacy settings you and your friends establish on those Third Party Social Networks. You can control and find out more about these settings at the Third Party Social Network in question. Please note, Third Party Social Networks are governed by their own privacy policies, terms and end user agreements and we are not responsible for, and have no control over, the sharing practices or policies of the third parties that operate those sites. For additional questions you can contact us at arealstudiosx17@gmail.com.

### 2. Data We May Access Via Third Party Social Networks

If you use the "Log in with" or "Connect to" feature we may access and store some or all of the following information, as allowed by you, Third Party Social Networks and your preferences: (i) your basic information from your public profile, such as your name, surname, profile picture, age range, gender, and other public information; (ii) email address, login ID and/or player identifier string (iii) list of your friends; (iv) any other information which is detailed and displayed to you in the notice which appears during the "Log in with" or "Connect to" process. We may share your name, profile picture and your game data (such as moves, App progress and scores) with respect to the applicable App, with your friends who have also used the "Log in with" or "Connect to" feature in connection with such App or with your contacts in applicable Third Party Social Media Network account.

The App may further ask you to allow us to post on such Third Party Social Networks on your behalf (e.g. photos, e-cards, videos and status updates). Please keep in mind that we will only do that if specifically allowed by you and we will store ID and your full name for the purposes of user identification. Other information will be merely stored within the App on your device so that the App will be able to communicate with Third Party Social Network directly; Voice recordings from Apps are also only being collected and stored within the Apps solely upon your request.

## 3. Consent to Publicly Display Data on Third Party Social Networks

If you use Third Party Social Networks to participate in game related activities, including but not limited to participation in leader boards, multi-player games or the downloading and uploading of content, AREAL STUDIOS and its affiliates may also collect, use, store, transmit and publicly display statistical data regarding game play (including scores, rankings and achievements), or identify content that is created and shared by you with other players. Data that personally identifies you is collected, used, stored and transmitted in accordance with this Privacy Policy.

## THIRD PARTY TERMS AND CONDITIONS

Please note that your access to and ability to use and interact with the Apps may be subject to certain third party terms and conditions and privacy policies, including but not limited to application stores, mobile software platforms, online gaming platforms, social networking services, statistics services providers and payment providers. You recognize and agree that AREAL STUDIOS is not liable for any such third party terms and conditions and their use of your personal information.

Our Apps may contain links to third party websites, products, or services. For example, the Apps may feature offers from third party advertisers or the ability to engage in transactions with such entities. Please note that while using such third party offerings, you are using sites, products, and services developed and administered by people or companies not affiliated with or controlled by us. We are not responsible for the actions of those people or companies, the content of their sites, products or services, the use of information you provide to them, or any products or services they may offer. Our link to such third parties does not constitute our sponsorship of, or affiliation with, those people or companies. Nor is such linking an endorsement of such third party's privacy or information security policies or practices or their compliance with laws. Information collected by third parties, which may include such things as location information or contact details, is governed by their privacy practices. These other websites or services may place their own cookies or other files on your computing device, collect information or solicit personal information from you. We encourage you to learn about the privacy practices of third parties with which you interact.

We are not responsible or liable for your interaction with such third parties, the information requests initiated by such third parties, or the subsequent use, treatment or dissemination of information you voluntarily choose to provide to them.

## CHILDREN'S PRIVACY

We consider ourselves to be family oriented, however we have decided to voluntarily implement higher child protection standards even though our products and services are not directed to, and we do not knowingly collect personal information from children under 13, with the sole exception of persistent identifiers as described below. If we learn that we have collected personal information other than persistent identifier of a child under the age of 13, we will take all reasonable steps to delete the information as soon as possible. If you become aware that your child has provided us with personal information without your consent, please contact us at arealstudiosx17@gmail.com.

To preserve the family-friendly reputation of our Apps, we age-gated some of the features in our Apps, so that they are not available for use by children under 13. The age gate is being conducted after the download of some of our Apps for specific territories to assure the privacy and protection of younger users of our Apps. The features enabling potential collection and sharing of personally identifiable information, except for persistent identifiers, are disabled for device IDs of users who did not pass the age gate. For user's safety, it is not possible to change the age later on. We do not store the year of birth of users who have identified themselves as below the age of 13 in our Apps, but only the information that their device ID did not pass the age gate.

The only personal information we collect from users who have identified themselves as below the age of 13 for the purposes of offering our services are persistent identifiers (such as device ID, IDFA, IDFV, advertising ID, IP address). Such persistent identifiers are used and shared with third parties solely for providing support for the internal operations meaning to place contextual advertisement (including frequency capping), to authenticate users of or personalize the content on Apps, to maintain or analyze the functioning of the Apps, personalize the content of the App (such as sending push notifications), to perform network communications to protect the security or integrity of the user or the App, to ensure legal or regulatory compliance.

When using the persistent identifiers we will not contact users under the age of 13, display behavioral advertising to them, nor do any user tracking or profiling. In addition, we strive that all of our advertising partners adhere to the same standards for the collection, usage and disclosure of children's personal information as we do, but we cannot be responsible if they breach the commitments, they gave to us regarding the collection of information. In case of such breaches, you agree that our liability is limited to the amounts we can receive as indemnification for the breaches from our advertising partner. For any additional questions about third party information disclosure please refer to arealstudiosx17@gmail.com. We will send push notifications only to

users who allow us to do so to re engage them in terms of using the App. You may unsubscribe at any time by following the instructions in section Push Notifications of this Privacy Policy. We strive to ensure that the content of the push notifications will always be family friendly. Push notifications are local, contextual and sent in app only and not from a server or in conjunction with other user information.

# **OPT-OUT**

You are always free to opt out from the future collection of your personal information by AREAL STUDIOS in accordance with this Privacy Policy by uninstalling all the Apps from each of your computing devices.

### **Opting Out of IBA**

#### 1. Via third party IBA providers

Google (AdMob) https://www.google.com/ads/preferences/html/mobile-about.html;

If you choose to opt out by following one of the third party IBA provider's opt out mechanisms, you should stop receiving ads based on your interest via the selected third party IBA provider, but you may continue to receive interest-based or targeted ads via other IBA providers. For opting out from receiving interest-based or targeted ads through all IBA providers, please see opt out options 2. below.

### 2. Via "Do Not Track Settings" in mobile phone

If you choose to opt out via "Do Not Track Settings" in your mobile phone all providers of advertising services are bound to comply with such "Do Not Track" setting, but we cannot provide any guarantees on their behalf. If you choose the opt-out option available via our Apps, we will not share your advertising ID with advertisers for the purposes of IBA. We provide no guarantees regarding the information provided prior to opting out. Some providers may have additional opt-out mechanisms implemented.

If you "Opt Out of Interest-Based Ads" on your Android device, you can restore interest-based ads by turning the settings off. When you opt out, you may still see the same number of ads on your

mobile device; however, these ads may be less relevant because they won't be based on your interests. Our advertising partners may continue to serve you ads based on other non-personal information, such as ads related to the content of the application you are using.

Your Android mobile device may provide a "Limit Ad Tracking" or "Opt Out of Interest-Based Advertising" setting. When you have opted out using this setting on a device, our partners will not use information collected from that device to infer your interests, or to serve ads to that device that are targeted based on your inferred interests.

You can find the setting for your mobile device by following the directions below or contact your device provider.

The reason for switching from device IDs to Advertising Identifier is that advertisers can use this identifier only for advertising and for no other purpose, while users can choose to opt out of tracking via the settings of mobile phone. Advertising Identifier is an anonymous identifier for advertising purposes which enables users to reset their identifier or opt out of interest-based ads. The parties participating in advertising are obligated to follow users' choice for opting out of tracking according to the app store guidelines.

#### ANDROID DEVICE

For Android devices with OS 2.2 and up and Google Play Services version 4.0 and up:

Open your Google Settings app \> Ads \> Enable "Opt Out of Interest-Based Advertising"

## **IN-APP PURCHASES**

Our Apps dot not have the facility for any in-app purchases just yet. Moreover, since the payment process is handled by the store("Google Play"), as such we do not store your credit/debit card details.

## **CHANGES TO OUR PRIVACY POLICY**

We will occasionally update this Privacy Policy as necessary to protect our users, furnish current information, and respond to legal and technical changes. The most current version of the Privacy Policy will govern our use of your information and will be available from within the latest update of the app and can be accessed via the privacy policy button in the legalinfo panel.

Should you request so by informing us on <u>arealstudiosx17@gmail.com</u>, we will send you all the updates of this Privacy Policy to your email. We will also inform you about any material updates of our Privacy Policy with an in-app banner and a link.

# **PRIVACY QUESTIONS**

If you have questions or concerns about AREAL STUDIOS' Privacy Policy or information processing, please contact us through <u>arealstudiosx17@gmail.com</u>.

AREAL STUDIOS Privacy Policy, v. 1.0, updated February 2021