## PRIVACY POLICY

Last updated January 09, 2025

This Privacy Policy for **Mini Supermarket**, developed by Oliver Lindell ("I," "me," or "my"), explains how and why I may access, collect, store, use, or share ("process") your personal information when you use my mobile game ("Services").

As an individual developer, I am committed to maintaining a simple and secure experience for all users. This Privacy Policy applies to your use of Mini Supermarket, including but not limited to when you:

- Download and use our mobile application (Mini Supermarket), or any other application of ours that links to this Privacy Policy
- Engage with us in other related ways, including any sales, marketing, or events

**Questions or concerns?** Reading this Privacy Policy will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

#### **SUMMARY OF KEY POINTS**

This summary provides key points from our Privacy Policy, but you can find out more details about any of these topics by clicking the link following each key point or by using our <u>table of contents</u> below to find the section you are looking for.

What personal information do we process? When you visit, use, or navigate our Services, Mini Supermarket operates without collecting, processing, or storing personal information. Our app is designed to deliver a seamless and enjoyable experience without requiring personal data from our users. Learn more about personal information you disclose to us.

**Do we process any sensitive personal information?** Some of the information may be considered 'special' or 'sensitive' in certain jurisdictions, for example your racial or ethnic origins, sexual orientation, and religious beliefs. We do not process sensitive personal information.

Do we collect any information from third parties? We do not collect any information from third parties.

**How do we keep your information safe?** We have adequate organisational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorised third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Learn more about how we keep your information safe.

What are your rights? Depending on where you are located geographically, the applicable privacy law may mean you have certain rights regarding your personal information. Learn more about your privacy rights.

**How do you exercise your rights?** The easiest way to exercise your rights is by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the Privacy Policy in full.

#### **TABLE OF CONTENTS**

- 1. WHAT INFORMATION DO WE COLLECT?
- 2. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?
- 3. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?
- 4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?
- 5. HOW LONG DO WE KEEP YOUR INFORMATION?
- **6. SECURITY AND PRIVACY COMMITMENT**

- 7. DO WE COLLECT INFORMATION FROM MINORS?
- 8. WHAT ARE YOUR PRIVACY RIGHTS?
- 9. CONTROLS FOR DO-NOT-TRACK FEATURES
- 10. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?
- 11. DO WE MAKE UPDATES TO THIS NOTICE?
- 12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?
- 13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

## 1. WHAT INFORMATION DO WE COLLECT?

## Personal information you disclose to us

In Short: Mini Supermarket does not collect or process any personal information you provide.

Mini Supermarket is committed to safeguarding user privacy. Our app is designed to operate without requiring users to provide personal information. We do not collect, store, or process any data that you might disclose during your interaction with the app.

If you contact us via email or other means for support or inquiries, we only use that information to respond to your query and do not retain it for any other purpose. Rest assured that our services are built to prioritize privacy and avoid unnecessary data collection.

**Sensitive Information.** We do not process sensitive information.

**Application Data.** If you use our application(s), we also may collect the following information if you choose to provide us with access or permission:

 Geolocation Information. We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile application(s), to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

- Mobile Device Access. We may request access or permission to certain features from your mobile device, including your mobile device's storage, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- Mobile Device Data. We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and system configuration information, device and application identification numbers, and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our application(s), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.
- Push Notifications. We may request to send you push notifications regarding your
  account or certain features of the application(s). If you wish to opt out from receiving
  these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of our application(s), for troubleshooting, and for our internal analytics and reporting purposes.

All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

#### Information automatically collected

*In Short:* Some information — such as your Internet Protocol (IP) address and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This

information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

The information we collect includes:

- Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, and settings and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps'), and hardware settings).
- Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the Services.

## 2. WHAT LEGAL BASES DO WE RELY ON TO PROCESS YOUR INFORMATION?

In Short: Mini Supermarket does not collect or process personal data. However, we use Google Analytics to gather anonymized, aggregated data for performance monitoring and improvement, which is carried out under legitimate business interests.

Mini Supermarket operates without collecting personal information from its users. Therefore, no personal data is processed under consent, contractual obligations, legal obligations, or other legal bases typically required under laws like the GDPR or CCPA.

For users in jurisdictions with specific data protection laws (e.g., EU, UK, Canada), the following points clarify our practices:

#### **Use of Google Analytics**

We rely on legitimate business interests to use Google Analytics, which processes aggregated, non-personal data to:

- Monitor app performance.
- Improve app features and functionality.
- Diagnose technical issues.

This data is anonymized and does not identify any individual. Users' activities are aggregated to help us understand general trends and enhance the app experience.

#### No Personal Data Processing

Since Mini Supermarket does not collect personal data, the legal bases for data collection and processing, such as consent, performance of a contract, or compliance with legal obligations, do not apply.

#### **Transparency and Accountability**

Our use of anonymized data ensures compliance with privacy regulations while maintaining the highest standards of user trust. If you have any questions about how anonymized data is handled, feel free to contact us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

#### 3. WHAT IS OUR STANCE ON THIRD-PARTY WEBSITES?

In Short: We are not responsible for the safety of any information that you share with third parties that we may link to or who advertise on our Services, but are not affiliated with, our Services.

The Services may link to third-party websites, online services, or mobile applications and/or contain advertisements from third parties that are not affiliated with us and which may link to other websites, services, or applications. Accordingly, we do not make any guarantee regarding any such third parties, and we will not be liable for any loss or damage caused by the use of such third-party websites, services, or applications. The inclusion of a link towards a third-party

website, service, or application does not imply an endorsement by us. We cannot guarantee the safety and privacy of data you provide to any third-party websites. Any data collected by third parties is not covered by this Privacy Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services, or applications that may be linked to or from the Services. You should review the policies of such third parties and contact them directly to respond to your questions.

## 4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

In Short: Mini Supermarket uses Google Analytics for limited purposes but does not employ cookies or similar tracking technologies directly within the app.

Mini Supermarket does not use cookies, web beacons, or pixels to track user interactions. However, we do use Google Analytics to gather anonymized and aggregated data to help us understand app performance and user engagement. This data does not include any personal information and is used solely to improve the app's functionality and user experience.

We do not permit third parties to use tracking technologies within the app for advertising or other purposes beyond the scope of Google Analytics. Our commitment to privacy ensures that no personally identifiable information is collected or shared through the app.

If you have questions or concerns about our use of analytics tools, please contact us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

#### **Google Analytics**

We may share your information with Google Analytics to track and analyse the use of the Services. To opt out of being tracked by Google Analytics across the Services, visit <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>. For more information on the privacy practices of Google, please visit the <a href="Google Privacy">Google Privacy</a> & <a href="Terms page">Terms page</a>.

## 5. HOW LONG DO WE KEEP YOUR INFORMATION?

In Short: We do not collect or store any personal information, so there is no retention of data.

Since Mini Supermarket does not collect, process, or store personal information from its users, there is no data retention policy applicable to the app. Our commitment to privacy ensures that no personal data is gathered or maintained during your use of the Services.

If you have any questions or concerns regarding privacy or security, feel free to contact us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

## **6. SECURITY AND PRIVACY COMMITMENT**

In Short: Mini Supermarket is designed with your privacy and safety in mind.

We do not collect, store, or process any personal information through our app. However, we are committed to providing a secure environment for our users. Our app is designed using modern development standards to minimize potential vulnerabilities and ensure a safe experience.

While we do not collect user data, we recommend using the app on secure networks to further enhance your safety. If you encounter any concerns or security issues, please contact us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

## 7. DO WE COLLECT INFORMATION FROM MINORS?

In Short: Mini Supermarket by Oliver Lindell is designed for children of all ages. We fully comply with the Children's Online Privacy Protection Act (COPPA) to ensure a safe, secure, and privacy-conscious environment for our young users. Importantly, we do not collect, process, or store any personal information from our users.

#### **Designed for Children**

Mini Supermarket is a mobile application tailored for children, offering a safe, engaging, and fun experience for users of all ages. As part of our commitment to child privacy, we have ensured that:

- The app does not require or prompt users to provide any personal information.
- There is no in-app tracking, data collection, or targeted advertising.
- Features are designed to engage children without compromising their privacy or safety.

#### **COPPA** Compliance

We adhere strictly to the guidelines set forth by the Children's Online Privacy Protection Act (COPPA), which regulates how online services interact with children under the age of 13.

Our key COPPA practices include:

- No Data Collection: We do not collect, request, or store any personal information from users. This includes names, addresses, phone numbers, email addresses, or any other identifying details.
- No User Accounts: The app does not require registration or the creation of user accounts, ensuring no data is captured at any stage.
- 3. **No Targeted Advertising:** Our app does not use cookies, trackers, or any other mechanisms for behavioral or targeted advertising.
- 4. **Parental Control**: The app does not contain features that would require parental consent, as no personal information is collected.

#### **Parental Assurance**

Mini Supermarket is built with the safety and enjoyment of children in mind. We ensure that:

- All content is age-appropriate and safe for children.
- The app does not contain any chat features, or external links that could redirect users outside the app environment.

## **Reporting Concerns**

If you believe that we have inadvertently collected any data, or if you have concerns about your child's use of the app, please contact us immediately at <a href="mailto:business@olillin.com">business@olillin.com</a>. We will investigate and take appropriate action, including the removal of any collected data.

#### 8. WHAT ARE YOUR PRIVACY RIGHTS?

In Short: Depending on your state of residence in the US or in some regions, such as the European Economic Area (EEA), United Kingdom (UK), Switzerland, and Canada, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time, depending on your country, province, or state of residence.

In some regions (like the EEA, UK, Switzerland, and Canada), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; (iv) if applicable, to data portability; and (v) not to be

subject to automated decision-making. In certain circumstances, you may also have the right to object to the processing of your personal information. You can make such a request by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

**Important Note**: Mini Supermarket by Oliver Lindell does not collect or process personal data. Therefore, these rights are not applicable to our app.

If you are located in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your <u>Member State data protection authority</u> or <u>UK data protection authority</u>.

If you are located in Switzerland, you may contact the <u>Federal Data Protection and Information</u> Commissioner.

<u>Withdrawing your consent:</u> If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us by using the contact details provided in the section 'HOW CAN YOU CONTACT US ABOUT THIS NOTICE?' below.

However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you have questions or comments about your privacy rights, you may email us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

#### 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT signals or any other mechanism that automatically communicates your choice

not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

California law requires us to let you know how we respond to DNT signals. Because there currently is not an industry or legal standard for recognising or honouring DNT signals, we do not respond to them at this time.

## 10. DO UNITED STATES RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

In Short: If you are a resident of California or Virginia, you may have the right to request access to and receive details about the personal information we maintain about you and how we have processed it, correct inaccuracies, get a copy of, or delete your personal information. You may also have the right to withdraw your consent to our processing of your personal information. These rights may be limited in some circumstances by applicable law. More information is provided below.

At **Mini Supermarket** by Oliver Lindell, we are committed to respecting your privacy and complying with U.S. data protection laws. As an app that does not collect personal information, many rights granted under U.S. privacy laws may not apply to our services. However, we outline these rights for transparency.

## **Categories of Personal Information Collected**

We do not collect, process, or store any personal information. This includes, but is not limited to, the following categories under U.S. data protection laws such as the California Consumer Privacy Act (CCPA):

Category	Examples	Collected
A. Identifiers	Name, alias, address, phone number, email, IP address, account details	NO

B. Personal Information	Employment history, financial information	NO
C. Protected Characteristics	Gender, age, race, marital status	NO
D. Commercial Information	Purchase history, transaction details	NO
E. Biometric Information	Fingerprints, voiceprints	NO
F. Internet Activity	Browsing history, search history	NO
G. Geolocation Data	Location data	NO
H. Sensory Data	Audio or video recordings	NO
I. Employment Information	Job title, professional qualifications	NO
J. Education Information	Student records	NO
K. Inferences	Profiles based on user behavior	NO
L. Sensitive Information	Government IDs, financial data	NO

#### **Sources of Information**

Since we do not collect personal data, no information is gathered through interactions such as customer support, surveys, or user inquiries.

## **Use and Sharing of Information**

We do not process or share personal data. The only data used is anonymized analytics from Google Analytics to improve app performance, which does not identify individual users.

#### Your Rights Under U.S. Law

Under U.S. privacy laws, including the CCPA, residents of certain states such as California and Virginia have specific rights. These include:

#### 1. Right to Know

 You have the right to know whether we collect and process personal data about you.

#### 2. Right to Access

You have the right to access any personal data collected about you.

#### 3. Right to Correct

You have the right to correct inaccuracies in your personal data.

#### 4. Right to Delete

• You may request the deletion of personal data collected.

#### 5. Right to Non-Discrimination

You have the right to not face discrimination for exercising your privacy rights.

#### 6. Right to Opt-Out

 You can opt out of the sale or sharing of personal data for targeted advertising or profiling.

**Note**: As Mini Supermarket does not collect personal data, these rights are not applicable to our app.

#### **How to Exercise Your Rights**

If you have questions about your privacy rights, or if you believe your rights under U.S. laws are impacted, you can contact us at <a href="mailto:business@olillin.com">business@olillin.com</a>. While we do not process personal data, we are happy to address any concerns.

#### California 'Shine The Light' Law

California Civil Code Section 1798.83 allows California residents to request information about personal data disclosed for direct marketing purposes. Since Mini Supermarket does not disclose any personal data, this law is not applicable.

## 11. DO WE MAKE UPDATES TO THIS NOTICE?

*In Short:* Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this Privacy Policy from time to time. The updated version will be indicated by an updated 'Revised' date at the top of this Privacy Policy. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your information.

## 12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at <a href="mailto:business@olillin.com">business@olillin.com</a>.

# 13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country or region, you may have certain rights regarding personal information, including the ability to request access to details about how it has been processed, correct inaccuracies, or delete your personal information. You may also have the right to withdraw consent to the processing of your personal information.

**Please note** that Mini Supermarket does not collect or store any personal data except for general analytics information managed by Google Analytics, which is anonymized and not directly associated with any individual.

For any inquiries or concerns regarding this Privacy Policy, feel free to contact me at: business@olillin.com.