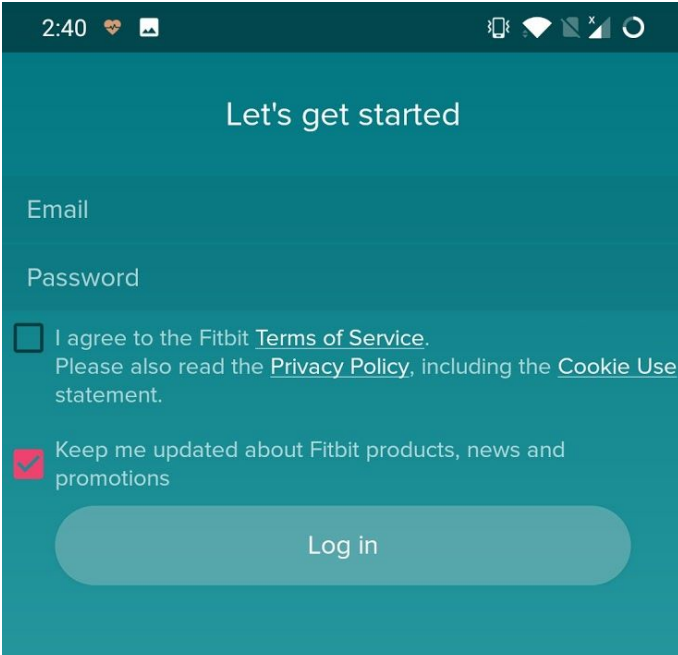


### Question 1

a) I have used Fitbit app available on the Google Play Store to draft the privacy notice. My aim is to minimize the text content (provided by Fitbit's privacy policy) and display the points that satisfy the requirements of the Model Privacy Draft. The following points are based on the information provided on <https://www.fitbit.com/legal/privacy>

- i) Fitbit is one of the health technology companies that is HIPAA compliant. However, they have not mentioned that on their website. I have included this information in my model
- ii) Fitbit has created the website to protect themselves from any legal consequences. However, I tend to display information to educate the user to protect their privacy. To ensure this, I have made sure to display most sensitive points that could pose a direct threat to user privacy
- iii) Fitbit has only summarized three sections mentioned in the Privacy Draft. To know about other sections, we need to go to another link that describes the details in long chunks of text. In order to make the user aware about all the privacy aspects, I have summarized and included all the points in one place.
- iv) With respect to sharing information with third party apps- Fitbit has mentioned this deep into their policy that the information will be used based on the third party's privacy policy. I have made sure that the user is aware of this information and can choose to opt out.
- v) Fitbit and its third party partners uses cookies which the users should be aware of. Fitbit has provided a separate link to explain the technical terms and use related to cookies. I have summarized this in a point and provided a link to the same

b) Fitbit allows the user to read the privacy policy after installing the app, before registration as shown in the screenshot. After selecting the url, it directs the user to Fitbit's privacy policy website. I believe most of the users would ignore this and move on to using the app. My aim is to display the information as a popup display just before registration. This would protect the user from sharing any information with the company before the user's consent.



2:40

Let's get started

Email

Password

☐ I agree to the Fitbit [Terms of Service](#). Please also read the [Privacy Policy](#), including the [Cookie Use statement](#).

☒ Keep me updated about Fitbit products, news and promotions

Log in

- c) The given link contains a pdf. A similar format would be presented before registration. The pdf contains links which would direct the user to the Fitbit policy, in case the user wants to know more about the policy.

<https://drive.google.com/open?id=1cYgMadGFr0D-7R0F0GEc46YrIO4vu3US>

## Question 2)

- a) The composed checklist is as follows (Note: the highlighted sentences are the ones that are present in the COPPA act):

- *(b) Direct notice to the parent. An operator must make reasonable efforts, taking into account available technology, to ensure that a parent of a child receives direct notice of the operator's practices with regard to the collection, use, or disclosure of personal information from children*
  - Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children? (312.4(a), 312.4(b))
- *Content of the direct notice to the parent under §312.5(c)(2) (Voluntary Notice to Parent of a Child's Online Activities Not Involving the Collection, Use or Disclosure of Personal Information)*
  - Does the direct notice contain the information that:
    - The operator has collected the parent's online information from the child in order to provide notice
    - Potential information may be collected in the future from the child
    - The parent has an option to comply or refuse to permit further contact with the child
    - The parent has access to delete the parent's and the child's online contact information
    - If the parent fails to respond to this direct notice, the operator may use the contact information collected from the child to accomplish the same
- *Notice on the Web site or online service. In addition to the direct notice to the parent, an operator must post a prominent and clearly labeled link to an online notice of its information practices§312.4(c)*
  - Does the operator have a clearly labeled link to an online notice of its information practices with regard to children?
  - Is the position of the link in close proximity to the area where such information is requested?
  - Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?
- *§312.5(2b)(c) Methods for verifiable parental consent.*
  - Does the operator make reasonable efforts to obtain parental consent, taking into consideration available technology?

- Does the operator take additional measures to verify that the person providing the consent is actually the parent of the child?
- Does the operator delete the contact information after multiple failed attempts to contact the parent
- Does the operator collect information from a child on a one time basis to respond to a specific request which is deleted later?
- Does the operator clearly state that the collected information of the child and the parent is to clearly protect the safety of the child and will not be shared for any other reason other than that protected by the law?
- **§312.6 Right of parent to review personal information provided by a child.**
  - Does the operator provide the requested information to the parent whose child has given the concerned information?
- **§312.7 Prohibition against conditioning a child's participation on collection of personal information.**
  - Is the operator fair in terms of the child's participation in the game and offering of a prize? The operator should not be unfair to the child in exchange for collecting additional information from the child
- **§312.8 Confidentiality, security, and integrity of personal information collected from children**
  - Does the operator take required measures to encrypt and protect the personal information collected from children?
- **§312.10 Data retention and deletion requirements.**
  - Does the operator delete all the personal information of the child and the parent after the purpose for which it is collected is served?

b)

The points highlighted in yellow are the ones stated in the privacy policies of the game company that comply to the points mentioned after them. The privacy policy of each app are given in the links

Play Store App	Compliant Policy points
Addition Flash Cards Math Help Learning Games Free <a href="http://eggrollgames.com/support/privacy/">(http://eggrollgames.com/support/privacy/)</a>	<p>Cross promotion ads are only accessible by entering a code to bypass a parental gate. Parental settings and purchases are similarly locked to prevent children from changing settings, following links, or making purchase.</p> <p>This point complies with- Does the operator provide the requested information to the parent whose child has given the concerned information?</p> <p>We do not collect data that personally identifies your children or the devices they use. - Does the operator collect information from a child on a one time basis to respond to a specific request which is deleted later?</p>

<p>PlayKids Party - Kids Games  <a href="http://apps.movile.com/playkids/Privacy-us.html">http://apps.movile.com/playkids/Privacy-us.html</a></p>	<p><b>Review and update your data:</b> You have the right to access and update any Personal Data that we have collected.- Does the operator provide the requested information to the parent whose child has given the concerned information?</p> <p><b>Delete your data:</b> You also the right to have your Personal Data deleted- Does the operator delete all the personal information of the child and the parent after the purpose for which it is collected is served?</p> <p><b>The Personal Information that we collect about you is stored on a secure, password-protected server-</b> Does the operator take required measures to encrypt and protect the personal information collected from children?</p> <p><b>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.-</b> Does the operator make reasonable efforts to obtain parental consent, taking into consideration available technology? Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?</p> <p><b>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-</b> .The parent has an option to comply or refuse to permit further contact with the child</p>
<p>Wonster Words: ABC Phonics Spelling Games for Kids  <a href="http://www.77sparx.com/privacy-policy/">http://www.77sparx.com/privacy-policy/</a></p>	<p><b>We may have parent-directed contents such as parent information, in-app-purchase, social media integration, and external links. All such contents are protected by parent gates to ensure only parents have access to these contents.-</b> Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of</p>

	<p>personal information from the children?</p> <p>We will use your information to respond to you regarding the reason you contacted us, e.g. to provide support. Does the operator collect information from a child on a one time basis to respond to a specific request which is deleted later?</p> <p>Does the operator clearly state that the collected information of the child and the parent is to clearly protect the safety of the child and will not be shared for any other reason other than that protected by the law?</p> <p>Unless you ask us not to, we may contact you via email in the future- Does the operator collect information from a child on a one time basis to respond to a specific request which is deleted later?</p> <p>You may contact us anytime via the email address below to:</p> <ul style="list-style-type: none"> <li>• See what data we have about you, if any.</li> <li>• Change/correct any data we may have about you.</li> <li>• Have us delete any data we may have about you.</li> <li>• Express any concern you have about our use of your data-</li> </ul> <p>Does the operator provide the requested information to the parent whose child has given the concerned information?</p> <p>Only employees who need the information to perform a specific job (for example, billing or customer service) are granted access to personally identifiable information.- Does the operator take required measures to encrypt and protect the personal information collected from children?</p>
<p>BabyFirst: Education Songs, Games &amp; TV for Kids</p> <p>(<a href="http://www.babyfirsttv.com/privacy-policy/">http://www.babyfirsttv.com/privacy-policy/</a>)</p>	<p><b>BFTV has made every effort to comply with the rules of the Children’s Online Privacy Protection Act 1998 (COPPA) and provide a safe and secure environment for babies and toddlers and their parents to use and enjoy this Site.-</b></p> <p>Does the operator have a clearly labeled link to an online notice of its information practices with regard to children?</p> <p>Is the position of the link in close proximity to the area where such information is requested?</p>

	<p>Children under the age of 13 must receive parental consent to use this Site. We do not knowingly collect Personal Information from Children without their parents consent and do not allow children to open accounts, or participate in competitions or sweepstakes. Only Parents may open accounts or enter competitions or sweepstakes.- Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?</p> <p>Parents may at any time contact us to receive information about our Children's privacy policy, or to enquire about any Personal Information that they believe may have been collected from their Child- Does the operator provide the requested information to the parent whose child has given the concerned information?</p> <p>Parents may, at any time, revoke their consent given for the collection of Personal Information from their Child- Does the operator provide the requested information to the parent whose child has given the concerned information? The parent has an option to comply or refuse to permit further contact with the child. The parent has access to delete the parent's and the child's online contact information</p> <p>Information is stored on secured servers and we shall use our best efforts and industry standard measures, technologies and procedures to preserve the integrity of personally identifiable information and to thwart unauthorized access- Does the operator take required measures to encrypt and protect the personal information collected from children?</p>
Hello Kitty Lunchbox	<b>Budge Studios complies with the</b>

(<https://budgestudios.com/en/legal/privacy-policy/?lg=en>)

**Children's Online Privacy Protection Act ("COPPA"), a U.S. law designed to protect the online privacy of children**

Does the operator have a clearly labeled link to an online notice of its information practices with regard to children?

Is the position of the link in close proximity to the area where such information is requested?

On occasion, in order to respond to a question or request from a child through a Child Directed App, Budge Studios may receive or need to ask for the child's online contact information, such as an email address. Budge Studios will delete this information immediately after responding to the question or request.

- Does the operator delete the contact information after multiple failed attempts to contact the parent?

Does the operator collect information from a child on a one time basis to respond to a specific request which is deleted later?

If we learn or have reason to suspect that we have collected personal information from a child in violation of COPPA, we will promptly delete it.

We take reasonable measures to maintain the confidentiality, security, and integrity of children's personal information.

- Does the operator take required measures to encrypt and protect the personal information collected from children?

For our Child Directed Apps, Budge Studios treats all users as children and does not screen users for age or offer registration.

Is the operator fair in terms of the child's participation in the game and offering of a prize? The operator should not be unfair to the child in exchange for collecting additional information from the child.

	<p>In the case of children under 13, as applicable, we will obtain a parent or legal guardian's verifiable consent prior to the collection of personal information from such users, unless the collection of such information falls within an exception that is permitted under COPPA.- Does the operator make reasonable efforts to obtain parental consent, taking into consideration available technology?</p> <p>For any comments, questions, or complaints regarding this Privacy Policy or our privacy practices, please do not hesitate to contact us!- Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?</p>
--	--

c)

Play Store App	Grade	Reason
Addition Flash Cards Math Help Learning Games Free ( <a href="http://eggrollgames.com/support/privacy/">http://eggrollgames.com/support/privacy/</a> )	D	<ul style="list-style-type: none"> <li>The privacy policy had only one line regarding privacy policies for children.</li> <li>The policy did not comply with COPPA act.</li> <li>It did not provide any notification to the parent regarding its updation. Moreover, it told the user to check the privacy policy page from time to time if the user was interested in it- <i>If this stuff is important to you, you should review the Privacy Policy from time to time.</i> I found this to be a bit rude and believe that every app should notify the user whenever they update their policy</li> <li>The app does not mention the steps taken by the company to keep their user data safe</li> </ul>
PlayKids Party - Kids Games ( <a href="http://apps.moveile.com/playkids/Privacy-us.html">http://apps.moveile.com/playkids/Privacy-us.html</a> )	B	<ul style="list-style-type: none"> <li>The policy has clearly mentioned different sections about how it uses the data</li> <li>However, the policy contains only two occurrences where it talks about parental consent and parental access to child's contact information</li> <li>The policy clearly mentions the parent's role in</li> </ul>



		<p>accessing the data provided to the app</p> <ul style="list-style-type: none"> <li>It also mentions the data retention policy but fails to regard the majority of the points with respect to children</li> </ul>
<p>Wonster Words: ABC Phonics Spelling Games for Kids (<a href="http://www.77sparx.com/privacy-policy/">http://www.77sparx.com/privacy-policy/</a>)</p>	C	<ul style="list-style-type: none"> <li>The policy is minimal with almost no coverage with regards to children</li> <li>The reason behind giving it a C, is that it clearly mentions it's requirement for parental consent</li> <li>The user cannot directly access the stored data from the app. The user has to email the company, requesting the information which could be a bit of hassle</li> <li>The company claims to protect the user data by giving limited access to it's employees</li> <li>The company does not record any personal user info without consent and has taken steps to protect children's privacy , hence I have given it a C</li> </ul>
<p>BabyFirst: Education Songs, Games &amp; TV for Kids (<a href="http://www.babyfirsttv.com/privacy-policy/">http://www.babyfirsttv.com/privacy-policy/</a>)</p>	A	<ul style="list-style-type: none"> <li>The company has separate notice for children's privacy</li> <li>It complies with almost all the points mentioned above</li> <li>It complies with COPPA act and has separately mentioned the access given to the parents</li> <li>It has also encouraged parents to educate children about their online privacy</li> </ul>
<p>Hello Kitty Lunchbox (<a href="https://budgestudios.com/en/legal/privacy-policy/?lg=en">https://budgestudios.com/en/legal/privacy-policy/?lg=en</a>)</p>	A	<ul style="list-style-type: none"> <li>The application policy ticks all the points mentioned above</li> <li>It takes parental consent and limits children to using features that are only directed towards parents</li> <li>The policy clearly explained every point with examples for the user</li> <li>The company has taken proper steps to maintain the privacy of children and also notifies the parent in case of policy change</li> </ul>

d)

Comments about the manual and automated approach-

The manual approach works better and has provided more accurate results than that of the automated approach. Since most of the policies do not contain separate sections with respect to

children, it is difficult to accurately predict the match using the automated approach. The automated approach picks up every sentence that seems similar to the keywords, even in cases where the sentence is not related to the privacy of children. This causes a significant dip in accurately predicting the matches with the checkpoint list, since all the checkpoints are based on the COPPA act. Additionally, the policies with more content tend to have a better score with the manual process than that of the automated process. Since there is more content present to evaluate, the automatic process fails to focus on the children's privacy points, which is accurately done in the manual process. This is because of the fact that keywords can be present in policy points that do not pertain to children as well.

The highlighted sentences from each policies are given below:

#####

Policy 1 matches are as follows:

\*\*\*\*\*

Sentences that match the given checkpoint->

At Eggroll Games, we do not collect personal data of any kind. We do collect anonymous data to help make our games better. This privacy policy is designed to share what type of data we collect and how we use it. It was last updated on May 14th, 2018.

Checkpoint->

Does the operator take additional measures to verify that the person providing the consent is actually the parent of the child?

\*\*\*\*\*

Sentences that match the given checkpoint->

We occasionally review the data to see if we can make our apps better. For example, we may make the most-played levels easier to access or examine the least-played levels to see what we can do to make them more engaging. This information is for internal use only and is not shared or sold.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

\*\*\*\*\*

Sentences that match the given checkpoint->

As is the case with many websites, we use cookies to operationally deliver our services. Our service provider, Cloudflare (see Third Party Services below) sets a cookie “\_cfduid” and maintains DNS

records held at Cloudflare enabling us to provide a secure connection. They set this cookie to identify your device as trusted. For more information visit:

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

\*\*\*\*\*

Sentences that match the given checkpoint->

For collecting anonymous data to make our apps better, we use Flurry, a GDPR compliant analytics service.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

\*\*\*\*\*

Sentences that match the given checkpoint->

If you have questions or requests regarding Flurry data, you may contact them via their privacy and data feedback form or mail them at:

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

#####

Policy 2 matches are as follows:

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

\*\*\*\*\*

Sentences that match the given checkpoint->

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.).

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

\*\*\*\*\*

Sentences that match the given checkpoint->

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.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

#####

Policy 3 matches are as follows:

\*\*\*\*\*

Sentences that match the given checkpoint->

We do not collect information such as your name, address, phone number or email address without your consent. We only have access to/collect personal information that you voluntarily give us via email or other direct contact from you. We will not sell, rent, or otherwise share this information with anyone. We will use your information to respond to you regarding the reason you contacted us, e.g. to provide support.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

\*\*\*\*\*

Sentences that match the given checkpoint->

You may contact us anytime via the email address below to:

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

#####

Policy 4 matches are as follows:

\*\*\*\*\*

Sentences that match the given checkpoint->

We may amend this Privacy Policy at any time, and the most recent version will always be available by selecting the "Privacy" link displayed on the site. The revised Privacy Policy will come into effect once posted on this site, and if you access or use the Site after that date, your use will constitute acceptance of such revised Privacy Policy. If a revision is material, we will notify you either through a notice that will appear on the site when you attempt to access the site after such material update, or via email or in another way. If any change to this Privacy Policy is not acceptable to you, your only remedy is to stop accessing and using the Site and terminate your account. Therefore, Users are encouraged to check this Privacy Policy frequently for amendments. If we make changes to the provisions of this policy regarding Children, in addition to posting them on the site, we will send notification to parents of Children whose email address has been provided to us. Therefore, if a parent changes his or her email address please inform us of the new address.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

\*\*\*\*\*

Sentences that match the given checkpoint->

Information provided when uploading data or content or participating in competitions or sweepstakes. This includes information provided when participating in activities such as Baby of the Week, Video of the Week and Baby U Courses as well as forums, blogs and communities and similar features. This may include your first name and surname, country and state of residence, age or date of birth, email, you user name and password, as well as pictures, videos and voice recordings of your baby or toddler and his or her first name.

Checkpoint->

Does the operator delete all the personal information of the child and the parent after the purpose for which it is collected is served?

\*\*\*\*\*

Sentences that match the given checkpoint->

Information provided to perform transactions. When you purchase a product or service from our Site, in addition to your first name and surname, country and state of residence, date of birth, email, user

name and password, we may also ask for your street or other billing address and your credit card or other payment details.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

\*\*\*\*\*

Sentences that match the given checkpoint->

Any information which you choose to publish, or to allow us to publish on any part of this Site will become accessible to others who may choose to collect such information, use it to contact you, redistribute it on the Internet or in other media, or make other use of it. We cannot prevent that. You should always exercise caution when responding to any contact or request that you receive from someone you do not know, or who you suspect may be posing as someone you know.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

\*\*\*\*\*

Sentences that match the given checkpoint->

Depending on the type of browser you use (e.g. "Chrome", "Explorer", "Safari", "Firefox", etc.), you can set or reset your browser to refuse or limit acceptance of cookies, or certain types of cookies, to warn you when a cookie is being sent, or to delete stored cookies. You may also refuse to continue to accept cookies on your first entry to our Site. However, if you refuse to accept cookies or disable cookies, certain features and services of our Site may become unavailable to you or may not function fully. To learn how to manage or disable cookies, consult your Browser's documents. We may also use "web beacons", which are small amounts of data, usually imbedded in images on web pages, which also allow us to track user preferences or other existing or future technologies that collect and use substantially the same type of information as cookies or web beacons collect and use. Disabling cookies will not necessarily disable all of these technologies. You may contact us to ask about this.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

\*\*\*\*\*

Sentences that match the given checkpoint->

We may use local shared objects, also known as flash cookies, to display content based upon what you view on our Site and to personalize your visit. Flash cookies are different from browser cookies because of the amount and type of data and how that data is stored. Cookie management tools provided by your browser will not remove flash cookies. You may learn how to manage privacy and



storage settings for flash cookies through articles published on the internet. Our servers automatically log (record) information that your browser sends whenever you visit our Site, which may include details of the pages you visited, services requested, your computer's Internet Protocol address, browser type, browser language, the date and time of your visit or request and one or more cookies that may uniquely identify your browser.

Checkpoint->

Does the operator take additional measures to verify that the person providing the consent is actually the parent of the child?

\*\*\*\*\*

Sentences that match the given checkpoint->

By registering to this Site, or any area of the Site, or by submitting your contact details in any other manner, you hereby grant us your explicit consent to use your personally identifiable information, including all contact information, to send you information and offers, including commercial or advertising email from us and/or our business partners or affiliates, using all means of communications provided by you, and to share that information with our business partners and affiliates, so as to contact you directly, unless you have clearly indicated that you are not interested in receiving such communication.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

\*\*\*\*\*

Sentences that match the given checkpoint->

Additionally, we may provide information, including personally identifiable information to a third party, as required by an order or subpoena issued by a judicial or administrative authority or by a law enforcement agency, or as we may in good faith, consider necessary under law, or upon a request or demand received by us in connection with a legal complaint, claim, suit or procedure.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

\*\*\*\*\*

Sentences that match the given checkpoint->

If we become aware that despite our safeguards a Child has submitted Personal Information, we will contact the Child's parent as soon as possible at the email address provided and ask him or her to verify that he or she consents to the submission. If the parent does not respond within two days, or if the Child has not provided a working and correct email for the Parent we will delete any Personal Information submitted.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

Parents may at any time contact us to receive information about our Children's privacy policy, or to enquire about any Personal Information that they believe may have been collected from their Child. This can be done by contacting us at: Website Manager, BFTV, 3550 Wilshire Blvd, 20th Floor, Los Angeles, CA 90010, USA, or by email to support@babyfirsttv.zendesk.com, or by telephone at (310) 756-6901.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

When you contact us to ask for specific information about your Child's information, we will first verify that you are the Child's parent. We may do this in one of the following manners: asking you to send us a signed verification form by post or fax, asking for photographic or documentary proof of identity, through a trained operator who will speak to you in person when you call the above dedicated telephone number, or by asking you to submit a valid credit card number.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

If you are concerned about cookies, you should make use of the features on your Browser that allow you to restrict or block cookies. In this case you will not be able to use certain features of this Site. For information on disabling Flash Cookies please go to the Site of Adobe. If you are concerned about other collection or tracking technologies that may be used on this Site you may read about them on the internet or elsewhere or may contact us and we will endeavor to provide you with relevant information or direct you to sources of information.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

If you do not wish to receive or to continue to receive electronic communications (such as emails) from us or our business partners, you may choose to opt-out from receiving such information by clicking on the link provided in all electronic communications received by you and following the instructions. In such case, we shall refrain from sending you advertising or promotional materials, as detailed in the opt-out message, but shall reserve the right to continue to contact you regarding your account and important information about this Site.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

You may at any time access, modify or delete any personally identifiable information submitted by you (not including user name) by using the access feature on the Site, if we incorporate such a feature, or by contacting our data protection officer at the following email: \_\_\_\_\_.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

California Civil Code Section 1798/83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write to us at: Website Manager, BFTV LLC, 3550 Wilshire Blvd, 20th Floor, Los Angeles, California 90010 – USA, or contact us by email at support@babyfirsttv.zendesk.com, or by telephone at (310) 756-6901

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

We use third-party advertising companies to serve ads when you visit our Web site. These companies may use aggregated information (not including your name, address, email address or telephone number) about your visits to this and other Web sites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, please see: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp)

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Policy 5 matches are as follows:

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Sentences that match the given checkpoint->

The ESRB certification seal shown on our Platforms confirms that Budge Studios is a valid licensee, and participating member, of the Entertainment Software Rating Board's Privacy Certified Program ("ESRB Privacy Certified"). To help protect your privacy, we have voluntarily undertaken this privacy initiative and have had all areas of our Platforms where this Privacy Policy is posted reviewed and certified by ESRB Privacy Certified to meet established online information collection, use, and disclosure practices. As a licensee of this program, we are subject to audits of our Platforms and other enforcement and accountability mechanisms administered independently by the ESRB.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

We reserve the right to make changes to this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Please check the Privacy Policy each time you use our Platforms to ensure you are aware of any changes in our privacy practices. Our Privacy Policy will indicate the date it was last updated. Your continued use of our Platforms will signify your acceptance of the changes to our Privacy Policy. If there is a material change in the way that we use your information under this Privacy Policy, we will notify you via email of the relevant changes or provide other prominent notice on our Sites and/or Apps.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

If you have any questions or comments about how we treat children's information or our compliance with COPPA, please contact us as set out in the How Do I Contact Budge Studios? section. If you would like to learn more about COPPA, you can refer to the Children's Privacy section of the Federal Trade Commission's website.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

B. Sites and Programs. Budge Studios does not knowingly collect personal information as defined by COPPA from children through its Sites or Programs. If we learn or have reason to suspect that we have collected personal information from a child in violation of COPPA, we will promptly delete it. Parents should note that if they provide information about their child through a Site or Program, COPPA will not apply to that information.

Checkpoint->

Does the operator delete all the personal information of the child and the parent after the purpose for which it is collected is served?

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Sentences that match the given checkpoint->

o Registration. For our Child Directed Apps, Budge Studios treats all users as children and does not screen users for age or offer registration. For our general audience Apps, Budge Studios may age screen users in accordance with COPPA and, where Budge Studios identifies a child user, either (1) direct that child to a version of the App treated as a Child Directed App that collects, uses and shares personal information in accordance with this section, or (2) seek verifiable parental consent in accordance with COPPA to the collection, use and sharing of personal information as otherwise set out in this Privacy Policy and, subject to receiving such consent and complying with COPPA, direct that child to a version of the App that collects, uses and shares personal information as otherwise set out in this Privacy Policy.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

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Sentences that match the given checkpoint->

o Email Contact. On occasion, in order to respond to a question or request from a child through a Child Directed App, Budge Studios may receive or need to ask for the child's online contact information, such as an email address. Budge Studios will delete this information immediately after responding to the question or request.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

Subject to our compliance with COPPA, Budge Studios may collect, use, share and otherwise process personal information from children in accordance with this Privacy Policy. We may also seek verifiable parental consent as necessary to comply with COPPA. In either case, we will not collect more personal information from children than is reasonably necessary to participate in our Child Directed Apps.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

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Sentences that match the given checkpoint->

As part of the verifiable parental consent process, where applicable, parents and legal guardians will have the choice of consenting to our collection and internal use of their child's personal information but prohibiting us from disclosing that information to third parties (except to the extent such disclosure is integral to our Apps). Additionally, any parent has the right to: (1) review, correct, or delete the child's personal information; and/or (2) discontinue further collection, use, or sharing of the child's personal information. Please note that exercising these choices may restrict your child's ability to access certain functionality of the Apps. To exercise any of these choices, please contact us as set out in the How Do I Contact Budge Studios? section.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

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Sentences that match the given checkpoint->

If you are a parent or guardian and believe that we have collected your child's personal information in violation of COPPA, please contact us as set out in the How Do I Contact Budge Studios? Section, and we will remove such information to the extent required by COPPA.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

If you a parent or legal guardian, information about your child such as your child's first name and last name initial, year of birth, gender, and country of residence.

Checkpoint->

Does the operator delete all the personal information of the child and the parent after the purpose for which it is collected is served?

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Sentences that match the given checkpoint->

Pixels (also known as web beacons), which is code embedded in a website, video, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a third party to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We incorporate pixels from third parties that allow us to track our conversions, bring you advertising both on and off the Sites, and provide you with additional functionality.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->

App Technologies, which are technologies included in our Apps that are not browser-based like cookies and cannot be controlled by browser settings. For example, our Apps include third party SDKs, which is code that sends information about your use to a server. These SDKs allow us to analyze the performance of our Apps, bring you advertising both on and off the Apps, and provide you with additional functionality. However, for our Child Directed Apps, we do not collect information for behavioral advertising.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->

- Service Providers. We transfer information to third party service providers that perform services on our behalf or otherwise collect, use, disclose, store or process information on our behalf for the purposes described in this Privacy Policy (such as for completing purchases, data analytics, marketing and advertising, website hosting, and technical support). Some of these service providers may be located in a country other than where you reside, including in Canada or the United States, and your information may be stored or processed in those countries. We implement reasonable contractual measures designed to ensure that our service providers provide appropriate protection for your information and use your information only for the purpose of providing the services to us. Your information may be subject to the legal requirements of the country in which it is located,

including lawful requirements to disclose information to government authorities in those countries only. Our employees and those of our agents and service providers who require it in order to fulfill their job requirements will have access to your information.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->

- Consent. We may share information to fulfill any other purpose as directed by you or with your consent. Generally, by providing us with information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified at the time that we collect the information from you or as otherwise described in this Privacy Policy. In the case of children under 13, as applicable, we will obtain a parent or legal guardian's verifiable consent prior to the collection of personal information from such users, unless the collection of such information falls within an exception that is permitted under COPPA.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

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Sentences that match the given checkpoint->

If you click on a link to a third party site, including on an advertisement, an ad provider link, or other third party service, you will leave the Budge Studios Platform you are visiting and go to the site you selected ("Third Party Service"). These Third Party Services may use Tracking Technologies to independently collect information about you and may solicit information from you. Because we cannot control the activities of third parties, we cannot accept responsibility for any use of your information by such third parties, and we cannot guarantee that they will adhere to the same privacy and security practices as Budge Studios. We encourage you to review the privacy policies of these third party sites from whom you request services. If you visit a Third Party Service that is linked to on a Budge Studios Platform, you should consult that site's privacy policy before providing any information on that site.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->



We may offer portions of our Platforms on or integrate portions of our Platforms with Third Party Services ("Third Party Features"). For example, we offer content on social networks such as a Facebook and Twitter. Any information you provide to us when you engage with our content (such as through our brand page) is treated in accordance with this Privacy Policy. Also, if you publicly reference our brand on a Third Party Service (e.g., by using a hashtag associated with Budge Studios in a tweet or post), we may use your reference on or in connection with our Platforms. Please be aware that if you use a Third Party Feature, both we and the applicable third party may have access to and use information associated with your use.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->

SuperAwesome is a valid licensee, and participating member, of ESRB Privacy Certified. To protect your privacy, SuperAwesome has voluntarily undertaken this privacy initiative, and its services have been reviewed and certified by ESRB Privacy Certified to meet established online information collection, use and disclosure practices. As a licensee of this privacy program, SuperAwesome's services are subject to frequent audits and other enforcement and accountability mechanisms administered independently by ESRB Privacy Certified.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

If you wish to request access to certain information you have voluntarily submitted to Budge Studios or request that such information be corrected or deleted, or if you have any questions, comments, or concerns about this Privacy Policy or the information practices of Budge Studios, please contact Budge Studios as set out in the How Do I Contact Budge Studios? section below. Your right to access, correct, or delete your information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Checkpoint->

Does the operator collect the parent's online information from the child in order to provide notice

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Sentences that match the given checkpoint->

• Do Not Track. Your browser may allow you to set a Do Not Track (DNT) signal indicating that you do not wish your online activity to be tracked. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Currently, our Sites' system does not support and cannot act on DNT signal headers that we may receive. However, the choices that we provide you concerning collection and use of your information will continue to operate as described in this Privacy Policy. For more information on "Do Not Track," visit <https://www.allaboutdnt.com>.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->

Please note that your opt-out is limited to the email address or device used and will not affect subsequent subscriptions.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are shared with third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes. Under the law, a business should either provide California customers certain information upon request or permit California customers to opt in to, or opt out of, this type of sharing.

Checkpoint->

Does the operator provide the requested information to the parent whose child has given the concerned information?

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Sentences that match the given checkpoint->

If you are a California resident and wish to obtain information about our compliance with this law, please contact us as set out in the How Do I Contact Budge Studios? section below. Requests must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that Budge Studios is not required to respond to requests made by means other than through the provided email address or mail address.

Checkpoint->

Does the notice contain the name, address, telephone number, email address of all operators that collect and maintain personal information from children?

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Sentences that match the given checkpoint->

Our Platforms are operated in Canada, and the information we collect is governed by Canadian law. If you are accessing the Platforms from outside of Canada, please be aware that information collected through the Platforms will be transferred to, processed, stored, and used in Canada, the United States, and other jurisdictions. Data protection laws in Canada may be different from those of your country of residence. Your use of the Platforms or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in Canada, the United States, and other jurisdictions as set out in this Privacy Policy. If your data is collected in Europe, we will transfer your personal data subject to appropriate safeguards, including standard contractual clauses.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?

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Sentences that match the given checkpoint->

Where the basis for our processing of personal data from children under 16 in Europe is consent, we will make appropriate efforts to verify that consent is given or authorized by the holder of parental responsibility over those children, and, if we learn or have reason to suspect that we have collected personal data from those children without parental consent, we will promptly delete it. If you are a child under 16 in Europe, please speak with your parent or guardian about this Privacy Policy so you can better understand how we use your personal data.

Checkpoint->

Does the operator obtain parental consent by directly notifying the parent with regard to the collection, use or disclosure of personal information from the children?