

# PRIVACY POLICY

Last updated: December 2025

## Welcome to Speed Puzzler!

Speed Puzzler is owned and operated by Turtle And Cub Apps.

Speed Puzzler values your privacy and the protection of your personal data. This privacy policy describes what information we collect from you, how we collect it, how we use it, how we obtain your consent, how long we keep it in our databases and, if necessary, with whom we share it.

By downloading, installing, and using the Speed Puzzler mobile application, you agree to the practices described in this privacy policy. Use of the platform is also subject to our terms and conditions. In this privacy policy, the words “platform” and “application” refers to the Speed Puzzler mobile application, “we”, “us”, “our”, and “Speed Puzzler”, refers to Turtle And Cub Apps, and “you”, and “user”, refers to you, the user of Speed Puzzler.

This privacy policy may change from time to time. Your continued use of the platform after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. This privacy policy has been developed and is maintained in accordance with all applicable national and international privacy and data protection laws and regulations.

## 1. GENERAL INFORMATION

The personal data of the users that are collected and processed through the platform:

- **Speed Puzzler mobile application (Available on Google Play).**

Will be under responsibility and in charge of:

- **Turtle And Cub Apps.**
- **Email: TurtleAndCubApps@gmail.com**

## 2. HOW WE OBTAIN YOUR CONSENT

By using the Speed Puzzler mobile application, developed and operated by Turtle And Cub Apps, the user declares that they have read and understood this Privacy Policy and gives their free, specific, informed, and unequivocal consent for the collection, processing, and use of their personal data as described herein. Such consent is considered to be expressly granted when the user performs any of the following activities, without this list being exhaustive:

- Downloading, installing, accessing, and using the Speed Puzzler application on their mobile device.

- Interacting with the puzzles available in the application, including measuring and recording the time taken to complete each puzzle, as well as generating and displaying statistics related to the user's speed and performance.
- Allowing the application to monitor and process, directly on the user's device, technical and usage data strictly necessary for the proper functioning of the time tracking and statistics presentation features.
- View, interact with, or receive advertisements within the app, which are displayed through third-party services such as Unity LevelPlay / ironSource, which may involve the processing of certain technical and usage data in accordance with the privacy policies of those providers.
- Communicate with Turtle And Cub Apps through the contact channels made available, including sending inquiries, support requests, or any other voluntary communication.
- Continue to use the application after being informed of the data processing practices described in this Privacy Policy or after any update thereto.

The processing of personal data is based, as applicable, on the user's consent in accordance with Article 6.1. a of the General Data Protection Regulation (GDPR), as well as on legal bases recognized by U.S. law and other applicable international regulations, such as the need to execute and provide the application functionalities requested by the user and the legitimate interest of the data controller in ensuring the proper functioning, security, and continuous improvement of the application. The user acknowledges that they may withdraw their consent at any time to the extent permitted by applicable law, without this affecting the lawfulness of the processing carried out prior to such withdrawal.

### **3. TYPES OF DATA COLLECTED**

Speed Puzzler collects and processes certain personal and non-personal data that the user provides directly or indirectly when using the mobile application and interacting with Turtle And Cub Apps' contact channels. Data collection is limited to what is strictly necessary for the operation of the application, the presentation of performance statistics, and the proper provision of the service.

**3.1. Game usage and performance data:** When using the application, data related to the user's activity within the game is collected, including, but not limited to, the time it takes to complete puzzles, resolution history, speed metrics, usage patterns, and performance statistics associated with the gaming experience. This data is automatically generated during use of the application and is monitored from the user's device for the sole purpose of displaying results, statistics, and progress within Speed Puzzler.

**3.2. Technical and device data:** During use of the application, certain technical data automatically generated by the device may be collected, such as device type, operating system, application version, language, technical identifiers, error logs, diagnostic data, and data related to the overall performance of the application. This information is used to ensure the stability, security, and proper functioning of Speed Puzzler.

**3.3. Communication data:** When the user communicates with Turtle And Cub Apps through the contact details provided, they may provide information such as their name, email address, message content, support requests, and any other information they choose to include in such communication. This data is used exclusively to respond to inquiries, support requests, comments, or communications related to the app.

**3.4. Advertising data:** The application displays in-game advertisements through third-party advertising services, such as Unity LevelPlay / ironSource. In this context, technical and interaction data related to the display, delivery, and performance of advertisements may be collected, such as device advertising identifiers, basic device information, ad interaction events, and aggregate metrics. Speed Puzzler does not directly control the data collected by these third parties, which is processed in accordance with their own policies.

**3.5. Aggregated and non-identifiable data:** Speed Puzzler may generate and use aggregated, anonymized, or non-identifiable data for statistical, analytical, and application performance improvement purposes, without such data being associated with an identifiable person.

#### **4. HOW LONG WE KEEP YOUR DATA**

Speed Puzzler will retain the personal and non-personal data collected only for as long as is reasonably necessary to fulfill the purposes for which it was obtained, including the proper functioning of the application, the recording and display of speed and performance statistics in puzzle solving, the improvement and optimization of the user experience, the handling of queries or communications made through the contact details, the management and display of advertisements within the application, as well as the fulfillment of applicable technical, contractual, or legal obligations. Data related to the time spent solving puzzles and associated statistics may be retained as long as the user keeps the application installed or actively uses the service, and may be deleted or anonymized when it is no longer necessary for those purposes. Communication information will only be retained for the period necessary to manage and respond to the corresponding request and may subsequently be deleted or archived in a limited manner. In all cases, Speed Puzzler will apply criteria of minimization and proportional retention, proceeding to delete, anonymize, or aggregate the data when there is no longer a legitimate need for its retention.

#### **5. PURPOSES OF DATA COLLECTION**

Speed Puzzler collects and uses users' personal and non-personal data only to the extent necessary for the proper functioning, improvement, and administration of the application, in accordance with the actions performed by users within it. The legitimate purposes for the collection and use of data are described below, organized according to the type of information processed.

**5.1. Puzzle usage and performance data.** Data related to the time spent by the user to complete the puzzles, as well as statistics derived from such performance, are collected for the purpose of enabling the main operation of the application, providing speed and performance

metrics, generating personal and comparative statistics, improving the user experience, optimizing the difficulty and dynamics of the puzzles, detecting usage patterns, correcting errors, and develop new features based on aggregate user behavior.

**5.2. Technical and device data.** Technical information associated with the user's device, such as device identifiers, operating system, application version, language, time zone, approximate IP address, and diagnostic data, is used to ensure the application's compatibility with different devices, prevent technical failures, ensure the stability and security of the service, perform maintenance, resolve incidents, analyze the overall performance of the application, and optimize its operation in different technological environments.

**5.3. Advertising and monetization data.** Data collected through advertising technologies integrated into the application, including advertising identifiers and data on interaction with ads displayed through Unity Level Play/IronSource, is used to display ads within the game, measure the effectiveness of advertising campaigns, limit ad repetition, detect fraudulent activity, generate aggregate advertising performance reports, and support the monetization model that allows the application to be offered to the user.

**5.4. Communication Data.** Information voluntarily provided by the user when communicating with Speed Puzzler through the available contact details, such as name, email address, or other message content, is used to respond to inquiries, respond to requests, provide technical support, manage complaints, improve customer service, and maintain an internal record of communications with users.

**5.5. Aggregated analytical and statistical data.** Data collected in aggregate or anonymized form is used for analytical and statistical purposes to understand the overall use of the app, evaluate trends, measure the success of existing features, plan future improvements, and make internal decisions related to the development and evolution of Speed Puzzler, without individually identifying users.

## **6. HOW WE SHARE INFORMATION**

The personal information of our customers and users is an important and fundamental part of our platform. Under no circumstances will we sell or share information with third parties that has not been previously authorized by the user or owner of the personal data. We share user information only and exclusively as described below.

**6.1. Third-Party Service Providers.** Speed Puzzler uses carefully selected third-party service providers to support the operation, maintenance, monetization, and improvement of the application, who may have limited access to certain information to the extent strictly necessary for the provision of their services. These providers include in-app advertising and monetization platforms, such as Unity LevelPlay/ironSource, which may collect and process technical and usage information for the purpose of displaying relevant ads, measuring campaign performance, and preventing fraud. Speed Puzzler may also use technology infrastructure providers, hosting services, analytics, and technical support providers that process data in a controlled manner and in accordance with the company's instructions. These third parties are not authorized to use the information for their own purposes other than to provide the

contracted services and are required to implement appropriate confidentiality and security measures.

**6.2. Newsletter and email marketing:** By providing us with your email address, you consent and agree that we may send you marketing content and newsletters, notifications and information related to our platform. Therefore, your email address may be shared with third party bulk email services for the sole and exclusive purpose of sending you relevant communications. If you wish to stop receiving communications from Speed Puzzler, you can unsubscribe at any time by using the "unsubscribe" option available in the same emails or by sending your request through our contact information.

**6.3. Business Transfers.** In the event that Speed Puzzler creates, merges with, or is acquired by another entity, your information will most likely be transferred. Speed Puzzler will email you or place a prominent notice on our platform before your information becomes subject to another privacy policy.

**6.4. Protection of Speed Puzzler and others.** We release personal information when we believe release is appropriate to comply with the law, enforce or apply our Terms and conditions and other agreements, or protect the rights, property, or safety of Speed Puzzler, our users or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

**6.5. With Your Consent.** Other than as set out above, you will receive notice when personally identifiable information about you might go to third parties, and you will have an opportunity to choose not to share the information.

## **7. PROTECTING YOUR INFORMATION**

We grant access to your personal information only to those outside persons or services that have a legitimate need to know it and in accordance with our privacy policy. We adhere to industry-recognized security standards to protect your personal information, both during transmission and in storage. However, it is important to note that no method of transmission over the Internet or electronic storage is foolproof and 100% secure. Therefore, while we at Speed Puzzler strive to implement commercially viable data protection methods, we cannot ensure absolute security of your personal information. We undertake not to sell, distribute or transfer your personal data to unauthorized third parties, unless we have your explicit consent or are required by law to do so.

## **8. DATA BREACH NOTIFICATIONS**

In the event of a security breach that compromises the confidentiality of our users' personal data, Speed Puzzler undertakes to notify those affected in a timely manner. This notification will be made through the means of contact that have been provided by the user on our platform. We will take all reasonable measures to protect the information and remedy any situation that jeopardizes the security of your data.

## 9. INTERNATIONAL DATA TRANSFER

Speed Puzzler may transfer users' personal data outside their country of origin due to the use of hosting, storage, and processing services provided by third parties operating servers located in different countries. These transfers are necessary to ensure the continuous operation of the platform and to provide an efficient user experience. Although Speed Puzzler is based in the United States, the technological infrastructure used may involve the storage or processing of data in jurisdictions with data protection laws that differ from those of the United States or your country of origin.

Speed Puzzler is committed to ensuring that all international transfers of personal data comply with applicable data protection regulations, including appropriate security measures to safeguard user information. This includes, but is not limited to, implementing standard contractual clauses, assessing the adequacy of data protection in the receiving country, and complying with applicable privacy standards on third party services.

By using Speed Puzzler, users consent to the transfer, storage and processing of their data on servers located outside their country of residence, acknowledging that such transfers are necessary for the operation of the platform. Speed Puzzler undertakes to take all reasonable steps to protect the integrity and security of personal data during such international transfers.

## 10. PRIVACY RIGHTS

Speed Puzzler users have the following rights in relation to the processing of their personal data, which they may exercise at any time in accordance with applicable law:

- **Right of access:** the user has the right to request confirmation as to whether their personal data is being processed and, if so, to obtain access to that information along with reasonable details about its processing, including the nature of the data and its general use.
- **Right to rectification:** users have the right to request the correction or updating of personal data that is inaccurate, incomplete, or out of date, taking into account the purposes of the processing.
- **Right to erasure (right to be forgotten):** Users may request the deletion of their personal data when it is no longer necessary for the purposes for which it was collected, when they withdraw their consent, or when they consider that the processing is unlawful, unless there is a legitimate obligation to retain it.
- **Right to restriction of processing:** users have the right to request that the processing of their data be restricted in certain circumstances, such as when they contest the accuracy of the data or while a request for objection or erasure is being assessed.

- **Right to object:** the user may object to the processing of their personal data when there are reasons related to their particular situation, especially in relation to processing that is not strictly necessary for the basic functioning of the application.
- **Right to data portability:** where applicable, the user has the right to receive the personal data they have provided in a structured and commonly used format, or to request that such data be transmitted to another data controller, to the extent that this is technically possible.
- **Right to withdraw consent:** when data processing is based on the user's consent, they may withdraw it at any time, without this affecting the lawfulness of the processing carried out prior to such withdrawal.
- **Right to lodge a complaint:** the user has the right to lodge a complaint with the competent supervisory authority, in particular in the country of their habitual residence, place of work, or where they consider that a data protection infringement has occurred.

To exercise any of these rights, the user must send a written request using the contact details provided in Speed Puzzler's privacy policy, providing sufficient information to verify their identity and clearly specifying the right they wish to exercise. Turtle And Cub Apps may request reasonable additional information when necessary to confirm the identity of the applicant and protect the data from unauthorized access. Requests will be dealt with without undue delay and, in any case, within a maximum period of thirty (30) calendar days from receipt, which may be extended in exceptional cases when the complexity or number of requests so requires, informing the user of such extension in a timely manner.

## **11. CHILDREN'S ONLINE PRIVACY PROTECTION**

We comply with the requirements of national and international data protection regulations regarding the protection of personal data of minors. We do not collect any information from children under the age of 13 (minimum age allowed to collect and process information without parental or legal guardian consent). If we become aware that a child under the age of 13 has provided us with personal information, we will take steps to delete such information.

## **12. THIRD PARTIES**

Except as otherwise expressly included in this privacy policy, this document addresses only the use and disclosure of information that Speed Puzzler collects from you. If you disclose your information to third parties, whether other users or third parties, different rules may apply to their use or disclosure of the information you disclose to them. Speed Puzzler does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. Speed Puzzler is not responsible for the privacy or security practices of other websites, platforms or services, including those linked from our platform. Please

review the privacy policies of any third-party websites, platforms or services you access through the Speed Puzzler platform.

### **13. CHANGES TO PRIVACY POLICY**

We reserve the right to change our privacy policy at any time. Changes will be promptly notified to our users through any electronic means and posted on the platform. Your continued use of our platform following such changes will signify your acceptance of the changes.

### **14. CONTACT INFORMATION**

If you have questions or concerns about this privacy policy and the handling and security of your data, please contact us through our contact information below:

**Turtle And Cub Apps - Speed Puzzler.**

**Email: [TurtleAndCubApps@gmail.com](mailto:TurtleAndCubApps@gmail.com)**