

IMPORTANT INFORMATION

In order to use Keiki mobile application (the "App", "Service"), we will ask you to enter your child's name, age and areas of interest (for example, what topics are already learned and what topics are to be learned). We also automatically collect from your device language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, Facebook ID, and other unique identifiers (such as IDFA). We need this data to provide our services, analyze how our customers use the App, to serve ads.

For improving the App and serving ads, we may share this data with third parties. Such parties include Facebook, Google, Apple, Appsflyer, Amplitude, Tableau. As a result of sharing this data with third parties we (1) analyze different interactions (how often users make subscriptions, what areas our users are interested in, etc.); (2) serve ads (and are able to show them only to a particular group users, for example, to subscribers). Please read our Privacy Policy below to know more about what we do with data. If any questions will remain unanswered, please contact us at support@yoursmartkid.com.

By tapping "Accept" button below you explicitly agree to the Terms and Conditions of Use, Privacy Policy (in particular, to sending your data to the third parties, as described above and in the Privacy Policy).

KEIKI PRIVACY POLICY

This Privacy Policy explains what personal data is collected when you use the Keiki mobile application (the "**App**") and the services provided through it (together with the App, the "**Service**"), how such personal data will be used, shared.

BY USING THE SERVICE, YOU PROMISE US THAT (I) YOU HAVE READ, UNDERSTAND AND AGREE TO THIS PRIVACY POLICY, (II) YOU ARE OVER 16 YEARS OF AGE (OR HAVE HAD YOUR PARENT OR GUARDIAN READ AND AGREE TO THIS PRIVACY POLICY FOR YOU) AND (III) YOU ARE A PARENT, LEGAL GUARDIAN, OR AN AUTHORIZED SCHOOL EMPLOYEE IN COMPLIANCE WITH APPLICABLE LAWS IF YOU USE OUR SERVICES ON BEHALF OF A CHILD. If you do not agree, or are unable to make this promise, you must not use the Service. In such case, you must (a) delete your/your child's account using the functionality found in "Settings" in the App, or contact us and request deletion of your/your child's data; (b) cancel any subscriptions using the functionality provided by Apple (if you are using iOS) or Google (if you are using Android); and (c) delete the App from your devices.

"**GDPR**" means the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

“**EEA**” includes all current member states to the European Union and the European Economic Area.

“**Process**”, in respect of personal data, includes to collect, store, and disclose to others.

TABLE OF CONTENTS

- 1. CATEGORIES OF PERSONAL DATA WE COLLECT**
- 2. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA**
- 3. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA (Applies only to EEA-based users)**
- 4. WITH WHOM WE SHARE YOUR PERSONAL DATA**
- 5. HOW YOU CAN EXERCISE YOUR RIGHTS**
- 6. AGE LIMITATION**
- 7. INTERNATIONAL DATA TRANSFERS**
- 8. CHANGES TO THIS PRIVACY POLICY**
- 9. CALIFORNIA PRIVACY RIGHTS**
- 10. DATA RETENTION**
- 11. HOW “DO NOT TRACK” REQUESTS ARE HANDLED**
- 12. PERSONAL DATA CONTROLLER**
- 13. CONTACT US**

1. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect data you give us voluntarily (for example, when you enter your child’s age or choose areas of interest). We also may receive data about you from third parties (for example, when you sign in via Facebook). Finally, we collect data automatically (for example, your IP address).

1.1. Data you give us

You provide us information about yourself/your child when you register for and/or use the Service. For example: name, age, areas of interest.

You do not have to give this data to us. You will be able to use the Service even if you do not give this data to us. However, in such case we may not be able to personalize the Service or contact you.

1.2. Data provided to us by third parties

When you decide to log in using Facebook, we get personal data from your Facebook account. This includes your profile image, name, and Facebook ID. Unless you opt out on the Facebook Login screen, we will also collect other data, such as email address.

For more information, please refer to the Facebook [Permissions Reference](#) (describes the categories of information, which Facebook may share with third parties and the set of requirements) and to the Facebook [Data policy](#). In addition, Facebook lets you control the choices you made when connecting your Facebook profile to the App on their [Apps and Websites page](#).

1.3. Data we collect automatically:

1.3.1. Data about how you found us

We collect data about your referring app or URL (that is, the app or place on the Web where you were when you tapped on our ad).

1.3.2. Device and Location data.

We collect data from your mobile device. Examples of such data include: language settings, IP address, time zone, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Facebook ID.

1.3.3. Usage data

We record how you interact with our Service. For example, we log your taps on certain areas of the interface, the features, and content you interact with, how often you use the App, how long you are in the app, and your subscription orders.

1.3.4. Advertising IDs

We collect your Apple Identifier for Advertising (“IDFA”) or Google Advertising ID (“AAID”) (depending on the operating system of your device). You can typically reset these numbers through the settings of your device’s operating system (but we do not control this).

1. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA

We process your personal data:

1.1. To provide our Service

This includes enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues.

1.2. To customize your experience

We process your personal data, such as areas of interest, to adjust the content of the Service and make offers tailored to your personal preferences. We also use our users' data to develop combined comparative statistics (e.g., 'your kid' vs 'other kid').

1.3. To manage your account and provide you with customer support

We process your personal data to respond to your requests for technical support, Service information or to any other communication you initiate. This includes accessing your account to address technical support requests. For this purpose, we may send you, for example, notifications about the performance of our Service, security, payment transactions, notices regarding our [Terms and Conditions of Use](#) or this Privacy Policy.

1.4. To communicate with you regarding your use of our Service

We communicate with you, for example, by push notifications. These may include information on certain App updates, or other information about the App. To opt out of receiving push notifications, you need to change the settings on your device.

The services that we use for these purposes may collect data concerning the date and time when the message was viewed by our App's users, as well as when they interacted with it, such as by clicking on links included in the message.

We use **Apple Push Notification** service ("APNs"), that is a notifications service provided by Apple. APNs allows us to send information to iOS devices. Apple's [privacy policy](#).

1.5. To research and analyze your use of the Service

This helps us to better understand our business, analyze our operations, maintain, improve, innovate, plan, design, and develop the App and our new products. We also use such data for statistical analysis purposes, to test and improve our offers. This enables us to better understand what features of the App our users like more. As a consequence, we often decide how to improve the

App based on the results obtained from this processing. For example, if we discover that users more often engage in specific area or activity type, we may develop and introduce similar features into the App.

To perform research and analysis about how users interact with our App we use **Appsflyer**. Appsflyer enables us to understand, in particular, how users find us (for example, who was the advertiser that delivered an ad to users, which led you to an app store with our App). Appsflyer also provides us with different analytics tools that enable us to research and analyze your use of the Service. [Privacy Policy](#), [Opt Out](#).

We use **Facebook Analytics**, which is a service is provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, in particular, aggregated demographics and insights on how many people launch our App as well as other interactions. [Privacy Policy](#)

We also use **Firebase Analytics**, which is an analytics service provided by Google. In order to understand Google's use of data, consult Google's [partner policy](#). Firebase [Privacy information](#). [Google's Privacy Policy](#).

We use **Amplitude**, a product analytics tool, to get aggregated demographics and insights on how many people launch our App and what is their behavior within the App. This helps us to develop our product and improve critical metrics. For additional details please see [Amplitude Privacy Policy](#).

To perform our App analysis, we also use **Tableau**, a company providing interactive data visualization products focused on business intelligence. [Tableau Software Privacy Policy](#).

1.6. To personalize our ads

We and our partners, including Facebook and Google, use your personal data to tailor ads and possibly even show them to you at the relevant time. For example, if you have installed our App, you might see ads of our products, for example, in your Facebook's feed.

How to opt out or influence personalized advertising

iOS: On your iPhone or iPad, go to "Settings," then "Privacy" and tap "Advertising" to select "Limit Ad Track". In addition, you can reset your advertising identifier (this also may help you to see less of personalized ads) in the same section.

Android: To opt-out of ads on an Android device, simply open the Google Settings app on your mobile phone, tap "Ads" and enable "Opt out of interest-

based ads”. In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads).

To learn even more about how to affect advertising choices on various devices, please look at the information available [here](#).

In addition, you may get useful information and opt out of some interest-based advertising, by visiting the following links:

- Network Advertising Initiative – <http://optout.networkadvertising.org/>
- Digital Advertising Alliance – <http://optout.aboutads.info/>
- Digital Advertising Alliance (Canada) – <http://youradchoices.ca/choices>
- Digital Advertising Alliance (EU) – <http://www.youronlinechoices.com/>
- DAA AppChoices page – <http://www.aboutads.info/appchoices>

We value your right to influence the ads that you see, thus we are letting you know what service providers we use for this purpose and how some of them allow you to control your ad preferences.

We use **Facebook Ads Manager** together with **Facebook Custom Audience**, which allows us to choose audiences that will see our ads on Facebook or other Facebook’s products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the App (for example, installed it). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook’s products (for example, Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience [here](#).

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go [here](#) or adjust your ads settings on [Facebook](#).

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows to us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our App (for example, show our ads to users who have purchased a subscription). Some other examples of events that may be used for tailoring ads include, in particular, installing our App, finishing a workout program. Google allows its users to [opt out of Google’s personalized ads](#) and to [prevent their data from being used by Google Analytics](#).

1.7. To enforce our Terms and Conditions of Use and to prevent and combat fraud

We use personal data to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud. As a result of such processing, we may share your information with others, including law enforcement agencies (in particular, if a dispute arises in connection with our [Terms and Conditions of Use](#)).

1.8. To comply with legal obligations

We may process, use, or share your data when the law requires it, in particular, if a law enforcement agency requests your data by available legal means.

1. UNDER WHAT LEGAL BASES WE PROCESS YOUR PERSONAL DATA (Applies only to EEA-based users)

In this section, we are letting you know what legal basis we use for each particular purpose of processing. For more information on a particular purpose, please refer to Section 2. This section applies only to EEA-based users.

We process your personal data under the following legal bases:

1.1. to perform our contract with you;

Under this legal basis we:

- Provide our Service (in accordance with our [Terms and Conditions of Use](#))
- Customize your experience
- Manage your account and provide you with customer support
- Communicate with you regarding your use of our Service

1.2. for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data;

We rely on legitimate interests:

- to communicate with you regarding your use of our Service

This includes, for example, sending you push notifications. The legitimate interest we rely on for this purpose is our interest to encourage you to use our Service more often.

- to research and analyze your use of the Service

Our legitimate interest for this purpose is our interest in improving our Service so that we understand users' preferences and are able to provide you with a better experience (for example, to make the use of the App easier and more enjoyable, or to introduce and test new features).

- to personalize our ads

The legitimate interest we rely on for this processing is our interest to promote our Service in a reasonably targeted way.

- to enforce our [Terms and Conditions of Use](#) and to prevent and combat fraud

Our legitimate interests for this purpose are enforcing our legal rights, preventing and addressing fraud and unauthorised use of the Service, non-compliance with our [Terms and Conditions of Use](#).

1.3. to comply with legal obligations.

2. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us operate, provide, improve, integrate, customize, support, and market our Service. We may share some sets of personal data, in particular, for purposes indicated in Section 2 of this Privacy Policy. The types of third parties we share information with include, in particular:

2.1. Service providers

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We share your personal information with the following types of service providers:

- data analytics providers (Facebook, Google, Appsflyer, Amplitude, Tableau)
- marketing partners (in particular, social media networks, including Facebook)
- notifications delivery services (Apple)

2.2. Law enforcement agencies and other public authorities

We may use and disclose personal data to enforce our [Terms and Conditions of Use](#), to protect our rights, privacy, safety, or property, and/or that of our affiliates, you or others, and to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, or in other cases provided for by law.

2.3. Third parties as part of a merger or acquisition

As we develop our business, we may buy or sell assets or business offerings. Customers' information is generally one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity (e.g. parent company or subsidiary) and may transfer such information in the course of a corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

1. HOW YOU CAN EXERCISE YOUR RIGHTS

To be in control of your personal data, you have the following rights:

Accessing / reviewing / updating / correcting your personal data. You may review, edit, or change the personal data that you had previously provided to us in the profile section of the App.

You may also request a copy of your personal data collected during your use of the App at support@yoursmartkid.com. If you have connected your Facebook account to our App or used your email for registration in our App, section "*Manage personal data*" in the App's settings will be available to you. You may select "*Request data*" there and receive a download link on your email (please note that the link typically expires over a few days). By clicking on the link, you will download a ZIP archive in a .zip file format; the archive will contain .json files that can be easily opened with a common text editor (for example, Notepad).

Deleting your personal data. You can request erasure of your personal data by sending us an email at support@yoursmartkid.com. If you have connected your Facebook account or used your email for registration in our App or entered your name in the App, section "*Manage personal data*" in the App's settings will be available to you. You may select "*Remove data*" there and we will delete the personal data collected from you.

When you request deletion of your personal data, we will use reasonable efforts to honor your request. In some cases we may be legally required to keep some of the data for a certain time; in such event, we will fulfill your request after we have complied with our obligations.

Objecting to or restricting the use of your personal data. You can ask us to stop using all or some of your personal data or limit our use thereof by requesting its erasure as described above or sending a request at support@yoursmartkid.com.

Additional information for EEA-based users. If you are based in the EEA, you have the following rights in addition to the above:

The right to lodge a complaint with supervisory authority. We would love you to contact us directly, so we could address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or where the alleged infringement has taken place.

The right to data portability. If you wish to receive your personal data in a machine-readable format, you can do so by requesting a copy of your personal data as described above (or send respective request at support@yoursmartkid.com. The data will be made available to you in the .json file format.]

1. AGE LIMITATION

We do not knowingly collect, maintain, or use personal information from children under 16 years old without their parent's/legal guardian's permission. If you learn that your child has provided us with personal information without your consent, please contact us at support@yoursmartkid.com.

1. INTERNATIONAL DATA TRANSFERS

We do business globally. We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in the [Terms and Conditions of Use](#) and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

In particular, if we transfer personal data originating from the EEA to countries with not adequate level of data protection, we use one of the following legal bases: (i) Standard Contractual Clauses approved by the European Commission (details available [here](#)), or (ii) the EU-U.S. Privacy Shield Framework (details available [here](#)), or (iii) the European Commission adequacy decisions about certain countries (details available [here](#)).

1. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Service or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

1. CALIFORNIA PRIVACY RIGHTS

California's Shine the Light law gives California residents the right to ask companies once a year what personal information they share with third parties for those third parties' direct marketing purposes. Learn more about what is considered to be [personal information under the statute](#).

To obtain this information from us, please send an email message to support@yoursmartkid.com which includes "Request for California Privacy Information" on the subject line and your state of residence and email address in the body of your message. If you are a California resident, we will provide the requested information to you at your email address in response.

Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

1. DATA RETENTION

We will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you), which includes (but is not limited to) the period during which you have an account with the App. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

1. HOW "DO NOT TRACK" REQUESTS ARE HANDLED

Except as otherwise stipulated in this Privacy Policy, this App does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

1. PERSONAL DATA CONTROLLER

ATOM OPERATIONS LIMITED, a company duly incorporated and validly existing under the laws of the British Virgin Islands, having its registered office at 116 Main Street, P.O. Box 3324, Road Town, Tortola, the British Virgin Islands will be the controller of your personal data.

1. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions. For any questions concerning your account or your personal data please contact us at support@yoursmartkid.com.

Effective as of: 10 December 2019