

## KidsLipi Inc. Privacy Policy

**Last modified:** February 4, 2021

### Introduction

KIDSLIPI INC. (the “**Company**”, “**us**” or “**we**”) respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you purchase, download, install, register with, access, or use the KidsLipi Learning App or KidsLipi.com (the “**Website**”, and collectively with the Learning App, the “**App**”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to the KidsLipi Learning App, Android version 3.1.0, iOS version 3.1.0, and subsequent versions of the App. The privacy policy last revised August 1, 2020 (available upon request) applies to all prior versions of the App. This policy applies only to information we collect through this App and in email, text, and other electronic communications sent through or in connection with this App, including through our Website.

This policy DOES NOT apply to information that:

- We collect through means unrelated to the App or on any other Company apps or websites.
- You provide to or is collected by any third party.

Our other apps and these third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy. This policy may change from time to time as described in the “Changes to Our Privacy Policy” section below. Your continued use of this App after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### Children Under the Age of 13

The Children’s Online Privacy Protection Act of 1998 and its rules (collectively, “**COPPA**”) require us to inform parents and legal guardians (as used in this section, “**parents**”) about our practices for collecting, using, and disclosing personal information as defined by COPPA (as used in this section, “personal information”) from children under the age of 13 (“**children**”). It also requires us to obtain verifiable consent from a child’s parent for certain collection, use, and disclosure of the child’s personal information.

This section notifies parents of:

- The types of information we may collect from children.
- How we use the information we collect.
- Our practices for disclosing that information.
- Our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent.
- All operators that collect or maintain information from children through the app.

This section only applies to children under the age of 13 and supplements the other provisions of this privacy policy. Only the other provisions of this privacy policy apply to teens and adults.

### **Information We Collect from Children**

Children can access many parts of the App and its content and use many of its features without providing us with personal information. However, some content and features are available only to registered users or require us to collect certain information, including personal information. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use the App.

We only collect as much personal information as is reasonably necessary for a user to participate in an activity, and we do not condition a user's participation on the disclosure of more personal information than is reasonably necessary.

### **Information We Collect Directly**

A user may use the general features of the App by downloading it through the user's app store and without entering any personal information. In order to use certain features within the App, a user (parent) must register through a valid email address, name, and a subscription activation code. When a user enters an email address, name, and subscription code, the email address and name are retained.

### **School Provided Children Info**

We may collect children's names from a school that uses KidsLipi learning platform. A school may use children's names to assign them to a class, to understand their language learning progress through the app, and other reporting needs. The school content and children information made available in the app only after a user (parent) has activated a child's school subscription.

### **Automatic Information Collection and Tracking**

We may use technology to automatically collect information from our users when they access and navigate through the App and use certain of its features. The information we collect through these technologies may include one or more persistent identifiers that can be used to recognize a user over time.

We do collect your child's learning progress if you have registered with the app and have activated a school subscription. The learning progress is made available to your child's school teachers and school personals.

We also may combine non-personal information we collect through these technologies with personal information about you or your child that we collect online.

For information about our automatic information collection practices, including how you can opt out of certain information collection, see the “Automatic Information Collection and Tracking”, “Information Collection and Tracking Technologies”, and “Choices About How We Use and Disclose Your Information” section below.

### **How We Use Your Child’s Information**

We use the personal information we collect about you and/or your child to:

- communicate about activities or features of the App that may be of interest; or
- track performance in games or other activities and for other analytics purposes.

We use the information we collect automatically (see “Automatic Information Collection and Tracking”) and other non-personal information we collect to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about the child’s preferences, allowing us to customize the content according to individual interests.
- Speed up searches.

### **Our Practices for Disclosing Children’s Information**

We do not share, sell, rent, or transfer children’s personal information other than as described in this section.

We may disclose aggregated information about many of our users, and information that does not identify any individual or device. In addition, we may disclose children’s personal information:

- To third parties we use to support the internal operations of our App and who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others, including to:
  - protect the safety of a child;
  - protect the safety and security of the App; or
  - enable us to take precautions against liability.
- To law enforcement agencies or for an investigation related to public safety.

In addition, if the Company is involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding or event, we may transfer the personal information we have collected or maintain to the buyer or other successor.

## **Accessing and Correcting Your Child's Personal Information**

At any time, you may review the child's personal information maintained by us, request us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's information.

You can request review, change, or delete your child's personal information by contacting your child's school directly or sending us an email at support@kidslipi.com. To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

**\*\*\* END OF COPPA-SPECIFIC POLICY SECTION \*\*\***

## **Information We Collect and How We Collect It**

For purposes of the general sections of this policy, "personal information" means information by which you may be personally identified, such as name, postal address, e-mail address, telephone number, and any other identifier by which you may be identified. In addition to personal information, we also collect information that does not identify you, including de-identified or aggregated information.

The information we collect depends on how you interact with the App. Users can access many parts of the App and its content and use many of its features without providing us with personal information. However, some content and features are available only to registered users or require us to collect certain information, including personal information. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use the App.

We only collect as much personal information as is reasonably necessary for a user to participate in an activity, and we do not condition a user's participation on the disclosure of more personal information than is reasonably necessary. Our collection and processing of your information is based on different contexts: our performance of a contract, our obligations under law, our legitimate interest in conducting our business, protection of a natural person's vital interests and/or upon your consent.

We collect information from and about users of our App:

- Directly from you when you provide it to us; and
- Automatically when you use the App.

## **Information You Provide to Us**

A user may use the general features of the App by downloading it through the user's app store and without entering any personal information. In order to use certain features within the App, a user (parent or other person over the age of 13) may be required to enter an email address, name, and an activation code. When a user enters an email address, name and a subscription, the email address and name are retained.

We may also ask you to provide information in connection with your use of the App, including:

- Information that you provide by filling in forms in the App. This includes information provided at the time of registering to use the App, subscribing to our service, and requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the App.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the App and of the fulfillment of your orders. You may be required to provide financial information to us or a third-party provider before placing an order.
- Your search queries on the App.

### **Automatic Information Collection and Tracking**

We may use technology to automatically collect information from our users when they access and navigate through the App and use certain of its features. The information we collect through these technologies may include one or more persistent identifiers that can be used to recognize a user over time. We also may combine non-personal information we collect through these technologies with personal information about you that we collect online. When you download, access, and use the App, it may use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, logs, and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, and mobile network information.
- **Stored Information and Files.** The App also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- **Location Information.** This App does not collect real-time information about the specific location of you or your device.

If you do not want us to collect this information do not download the App and/or delete it from your device. For information about our automatic information collection practices, including how you can opt out of certain information collection, see the "Automatic Information Collection and Tracking Technologies" and "Choices About How We Use and Disclose Your Information" sections of our general Privacy Policy.

### **Automatic Information Collection and Tracking Technologies**

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your device. It may be possible to refuse to accept mobile cookies by activating the appropriate setting

on your device. However, if you select this setting you may be unable to access certain parts of our App.

- **Web Beacons.** Pages of the App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or opened an email and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

### **Third-Party Information Collection**

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use this App. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information, to:

- Communicate about activities or features of the App that may be of interest.
- Track user performance in games or other activities and for other analytics purposes.
- Provide you with the App and its contents, information about our company, products and services, and any other information, products, or services that you request from us.
- Process your requests and fulfill any other purpose for which you provide it or consent.
- Give you notices about your account/subscription, including expiration and renewal notices.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when App updates are available, and of changes to any products or services we offer or provide through it.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the App.
- Run analytics on use of the App.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please use the link provided in the applicable email to unsubscribe from further communications of this nature.

Although the sections above describe our primary purposes in collecting your information, in many situations we have more than one purpose. For example, if you complete an online purchase or other transaction we may collect your information to perform our contract with you, but we also have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order. As a result, our collection and processing of your information is based on different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

### **Disclosure of Your Information**

We may disclose aggregated information about our users and information that does not identify any individual or device, without restriction. We do not share, sell, rent, or transfer personal information other than as described in this section.

We may disclose personal information that we collect or users provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- If we are required to do so by law or legal process, such as to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including our Terms of Use, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers or others. This includes exchanging

information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **Your Choices About Our Collection, Use, and Disclosure of Your Information**

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms for you to control certain uses and disclosures of your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the App may then be inaccessible or not function properly.
- **Promotion by the Company.** If you do not want us to use your email address to promote our own or third parties' products or services, you can opt-out by using the link provided in the applicable email to unsubscribe from further communications of this nature.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's [website](#).

### **Deleting, Accessing, and Correcting Your Personal Information**

Typically, we retain your personal information for the period necessary to provide you with access to the App and to otherwise fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. In addition, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce our agreements. The precise periods for which we keep your personal information vary depending on the nature of the information and why we need it.

You may send us an email at [support@kidslipi.com](mailto:support@kidslipi.com) to request to review, request access to, correct, or delete, or object to processing of any personal information that you have provided to us to the extent applicable law provides you with such rights. To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to delete or change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect or if applicable law does not require deletion.

### **Rights of California Residents**

This section supplements our Privacy Policy with respect to the California Consumer Privacy Act of 2018 ("**CCPA**") and applies solely to all visitors, users, and others who reside in the State of California ("**consumers**" or "**you**"). This section does not apply to personal information (defined below) collected from California-based employees, job applicants, contractors, or similar individuals. Any terms defined in the CCPA have the same meaning when used in this section.

## **Information We Collect**

We collect certain information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (for the purposes of this section only, “**personal information**”). Personal information does not include publicly available information, such as deidentified or aggregate consumer information, or information excluded from the CCPA’s scope.

The following is a list of all categories of personal information which we collect, or have collected from California Residents, in the twelve (12) months prior to the effective date of this policy (each, a “**Category**”):

- Identifiers.
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
- Commercial information.
- Internet or other similar network activity.
- Geolocation data.

We obtain each Category directly from you (either directly or through a third-party provider referenced above) or by way of collection through the App, service providers and/or payment processors. We share each Category for a business purpose with service providers, payment processors, and other third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

## **Uses**

We may use or disclose the personal information we collect for one or more of the following purposes: (i) providing the App (including without limitation maintaining your account, processing and fulfilling orders, and administering surveys and contests); (ii) providing customer support for the App; (iii) operating the App (including without limitation managing third party relationships and enabling usage of our service providers); (iv) communicating with you; (v) customizing the App; (vi) securing and protecting the App (including without limitation auditing the App, bug and fraud detection, debugging and repair of errors and the detection, protection and prosecution of security incidents or illegal activity); (vii) enforcing our terms and policies; (viii) complying with law; (ix) verifying your identity; and (x) other business purposes about which we may notify you from time to time.

## **Sale**

In the preceding twelve (12) months, we have not sold personal information as that term is defined based on our understanding of the CCPA and its implementing regulations.

## **Non-Discrimination**

We do not discriminate against California residents who exercise any of their rights described in this section.

## **Your Requests**

Subject to certain exceptions and restrictions, the CCPA provides California consumers the right to submit requests to a business which has collected their personal information: (i) to provide them with access to the specific pieces and categories of personal information collected by the business about such consumer, the categories of sources for such information, the business or commercial purposes for collecting such information, and the categories of third parties with which such information was shared; and (ii) to delete such personal information (each, a “California Request”). We need certain types of information so that we can provide the App to you. If you ask us to delete some or all of your information, you may no longer be able to access or use the App. If you are a California consumer, please follow the instructions in the “Deleting, Accessing, and Correcting Your Personal Information” section above to submit California Requests and note that you are a California consumer when you do so.

California Civil Code Section 1798.83 permits users of our App that are 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 send an email to [info@kidslipi.com](mailto:info@kidslipi.com) or write us at: KIDSLIPI INC., 16192 Coastal Highway, Lewes, DE 19958.

## **Data Security**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on secured servers behind firewalls. Any payment transactions and will be encrypted using SSL or other comparable technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## **Data Transfers**

Personal information that you submit through the Services may be transferred to countries other than where you live, such as, for example, to servers in the U.S. Your personal information may be transferred to countries that do not have the same data protection laws as the country in which you initially provided the information.

We rely upon a number of means to transfer personal information which is subject to the European General Data Protection Regulation (“**GDPR**”), including transfer of personal information to recipients that have entered into the European Commission approved contract for the transfer of personal data outside the European Economic Area.

## **Changes to Our Privacy Policy**

We may update our privacy policy from time to time. If we make material changes to how we treat our users' personal information, we will post the new privacy policy on this page and those changes will be effective one week after the "Last modified" date indicated on the updated policy. We will provide reasonable notice of material changes by, without limitation, posting notice on the App or contacting you.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you and for periodically visiting this privacy policy to check for any changes.

## **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at: [info@kidslipi.com](mailto:info@kidslipi.com)