

Game Learning Children's Privacy Policy

Last Updated: 3/12/18

This children's privacy policy ("**Children's Privacy Policy**") describes how Game Learning, LLC ("**Game Learning**", "**we**", "**us**", and "**our**") collects, uses and discloses Personal Information of users of our website located at www.gamelearning.co, our mobile applications ("**Applications**"), and our widgets (collectively, the "**Site**") and the services ("**Services**"), who are under 13 years of age (each a "**Child**" and, collectively, "**Children**"). As used in this Children's Privacy Policy, "**Personal Information**" means any information that can be used to contact or identify your Child (e.g., your Child's name or email address).

This Children's Privacy Policy does not apply to users age 13 or older; such users should refer to the Game Learning Privacy Policy, available at www.gamelearning.co

Children's Online Privacy Protection Act

We are required under the Children's Online Privacy Protection Act ("**COPPA**") to obtain verifiable parental consent in order to collect, use or disclose Personal Information from Children. If you provide such consent, you agree to the collection, use and disclosure of your Child's Personal Information in accordance with this Children's Privacy Policy. IF YOU DO NOT PROVIDE SUCH CONSENT, YOU MAY NOT ALLOW YOUR CHILD TO USE THE SITE OR SERVICES.

What Types of Information Do We Collect?

Information Your Child Provides to Us.

- If your Child contacts us via e-mail, we will collect your Child's name and e-mail address, in addition to any other content included in the e-mail in order to send your Child a reply.
- We collect and store any content that your Child uploads, downloads or accesses via the Site, which may include Personal Information. After registration, we will retain any information in your Child's account and add such information to the information provided during the registration process. This will include but not be limited to information concerning eLearning, downloads, messages, and assessments.
- We may collect your Child's phone number and the unique device id number of the mobile device on which your Child uses the Site and Services.
- When your Child participates in one of our surveys, we may collect additional Personal Information.
- If your Child participates in a contest, sweepstakes or other promotion, we will collect any data your Child provides in connection with that promotion.
- We also collect other types of Personal Information that your Child provides to us voluntarily.
- We may also collect Personal Information at other points on the Site and Services that state that Personal Information is being collected.

Information Collected via Technology:

- Information Collected by Our Servers. To make our Site and Services more useful to you, our servers (which may be hosted by a third party service provider) collect

information from your Child, including browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your Child’s computer when using the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

- Log Files. We collect information about the type of device your Child uses, your Child’s Open Device Identification Number (“**ODIN**”), date/time stamps for your Child’s visit, your Child’s unique device identifier (“**UDID**”), domain name, operating system, browser type, Internet service provider (ISP), referring/exit pages, operating system, clickstream data, the address of a referring site and your Child’s activity on Game Learning. This information is not treated as Personal Information unless we combine it with or link it to any of the Personal Information listed above.
- Cookies. Like many online services, we use cookies to collect information. “Cookies” are small pieces of information that a website sends to your Child’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. This type of information is collected to make the Site more useful to you and to tailor the experience with us to meet your special interests and needs. We may use both session cookies and persistent cookies to better understand how your Child interacts with our services, to monitor aggregate usage by our users and web traffic routing on our services, and to improve our services. Most Internet browsers automatically accept cookies. You can instruct your Child’s browser, by editing its options, to stop accepting cookies or to prompt your Child before accepting a cookie from the websites you visit. In addition, we use third party analytics services (e.g. Google Analytics) that use cookies and other technologies to analyze your Child’s use of Game Learning. The analytics services’ ability to use and share information collected by them is restricted by their terms of use and privacy policy, which you should refer to for more information about how these entities use this information, and how you can opt-out of their use of such information.
- Pixel Tags. In addition, we use “Pixel Tags” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s computer hard drive, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ Personal Information.
- Google Analytics. We use Google Analytics to help analyze how users use the Site. Google Analytics uses Cookies to collect information such as how often users visit the Site, what pages they visit, and what other sites they used prior to coming to the Site. We use the information we get from Google Analytics only to improve our Site and Services. Google Analytics collects only the IP address assigned to you on the date you visit the Site, rather than your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with your Personal Information. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Site, the Cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

Information Collected from Third Party Companies. We may receive Personal Information and/or Anonymous Data about you from companies that provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our Site. These third party companies may supply us with Personal Information.

We may, and you authorize us to, rely on the instructions that we reasonably believe are given by you as a parent or guardian of your Child. For example, if a person calls our customer support number and provides the account information we request, we may assume that the person calling is the Child's parent or guardian. We will not be held liable for any disclosure made in good faith and following reasonable procedures in responding to a request for disclosure of a Child's Personal Information from the parent of guardian.

How Do We Use the Information We Collect?

We use the information collected from your Child (including your Child's Personal Information) for the following purposes:

- to provide the Services, including by providing information such as task completion rate, number of Games played, the success rate of the Games, and to track trends relating to your Child;
- to respond to your Child's emails, submissions, questions, comments, requests, and complaints and provide customer service;
- to monitor and analyze usage and trends, and to increase the functionality and user friendliness of our services;
- to improve our Services and to develop and improve marketing and advertising for our Services;
- to help understand your Child's needs and provide your Child with better assessments and tools;
- to identify your Child as a user in our system and to facilitate the creation of and secure your Child's account on our network;
- to send your Child confirmations, updates, security alerts, administrative messages and otherwise facilitate your use of, and our administration and operation of, our services; and
- For any other purpose that is communicated to your Child when we collect the information.

Anonymous and/or Aggregate Data. We may also create anonymous and/or deidentified data records from your Child's Personal Information by excluding information that makes the data personally identifiable to your Child ("**Anonymous Data**"). Generally, we use this Anonymous Data to gain better insight into how our Services are working and to conduct research about global trends. We reserve the right to use Anonymous Data for any purpose and disclose anonymous data to third parties in our sole discretion.

What Information Do We Share With Third Parties?

We share the Personal Information we have collected from your Child as described below:

(a) Third Party Service Providers. We may share your Child's Personal Information with third party service providers to: provide your Child with the Services that we offer your Child through our Site; for third party assessment tools; to conduct quality assurance testing; to

facilitate creation of accounts; to provide technical support; and/or to provide other services to the Company. These third party service providers are required not to use your Child's Personal Information other than to provide the services requested by Company.

(b) Affiliates. We may share some or all of your Child's Personal Information with our parent company, subsidiaries, joint ventures, or other companies under a common control ("**Affiliates**"), in which case we will require our Affiliates to honor this Privacy Policy.

(c) Corporate Restructuring. We may share some or all of your Child's Personal Information in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Information may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Information collected by us and will assume the rights and obligations regarding your Child's Personal Information as described in this Privacy Policy.

(d) Disclosure to Third Party Companies. We may enter into agreements with companies that provide our Services by way of a co-branded or private-labeled website or companies that offer their products and/or services on our website ("**Third Party Companies**"). A Third Party Company may want access to Personal Information that we collect from its customers. As a result, we may disclose your Child's Personal Information to a Third Party Company; however, we will not disclose your Child's Personal Information to any Third Party Company for the Third Party Company's own direct marketing purposes, unless you have "opted-in" by following the instructions we provide to allow such disclosure. If you have opted-in to receive e-mail communications from a Third Party Company and later wish to discontinue receipt of these e-mails, please contact the Third Party Company directly to update your preferences. The privacy policies of these Third Party Companies may apply to the use and disclosure of your Child's Personal Information that we collect and disclose to such Third Party Companies. Because we do not control the privacy practices of Third Party Companies, you should read and understand their privacy policies.

(e) Other Disclosures. Regardless of any choices you make regarding your Child's Personal Information (as described below), we may disclose Personal Information if we believe in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on Game Learning; (c) to protect or defend the rights or property of Game Learning or users of the Site or Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

Links to Third Party Sites or Applications

Game Learning may contain links to other sites or applications. Any information your Child provides on those sites or applications is provided directly to the owner of that site or application and is subject to that party's privacy policy. Our Children's Privacy Policy does not apply to such sites, and we are not responsible for the content or privacy and security practices and policies of those sites.

Security

Game Learning is committed to protecting the security of your Child's Personal Information. We use a variety of industry-standard security technologies and procedures to help protect your Child's Personal Information from unauthorized access, use, or disclosure. We also require your Child to enter a password to access your Account information. Please do not disclose your Child's Account password to unauthorized people. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while Game Learning uses reasonable efforts to protect your Child's Personal Information, Game Learning cannot guarantee its absolute security.

Your Choices Regarding Information Your Child Provides.

(h) Email Communications. You or your Child may "opt out" of receiving marketing or promotional emails or other messages from us by changing your Child's Account preferences or by following the instructions to "unsubscribe" in those messages. Note that, even if you or your Child opts out of these communications, your Child may still receive messages from us regarding the administration of your Child's account and your Child's use of our services.

(i) Cookies. If you decide at any time that you no longer wish to accept Cookies from our Services for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. If you do not accept Cookies, however, you may not be able to use all portions of the Services or all functionality of the Services.

(j) De-Linking SNS. If you decide at any time that you no longer wish to have your Child's SNS account (e.g., Facebook) linked to his or her Account, then you may de-link the SNS account in the "preferences" section in your account settings. You may also manage the sharing of certain Personal Information with us when your Child connects with us through an SNS, such as through Facebook Connect. Please refer to the privacy settings of the SNS to determine how your Child may adjust our permissions and manage the interactivity between the Services and your Child's social media account or mobile device.

(k) Changing or Deleting Your Child's Personal Information. You or your Child may access, change, and review certain of the Personal Information your Child provides by logging into your Child's Account. You or your Child can also request to access, change, review, or delete the Personal Information your Child provided us by contacting us at the contact information. We will take steps to change such Personal Information as soon as is practicable. **IF YOU REQUEST TO DELETE SUCH PERSONAL INFORMATION, WE WILL NO LONGER ALLOW YOUR CHILD TO USE THE SITE OR SERVICES.** We will delete such Personal Information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion. We will take steps to delete such Personal Information as soon as practicable, but deleted information may remain in archived/backup copies for our legitimate business purposes and as otherwise required by law. Upon your request, we will delete the Child's account and all the information and data stored for such account. We will not have any liability whatsoever for any termination of the account or related deletion of the Personal Information therein. After termination, your Child will not be able to use his or her account anymore. We will retain your Child's Personal Information for only as long as is reasonably necessary to fulfill the purpose for which the information was collected.

(l) Applications. You can stop all collection of information by the Applications by uninstalling them, either through the standard uninstall processes as may be available as part of your mobile device or via the mobile application marketplace or network.

How We Respond to Do Not Track Signals

We do not currently respond to “Do Not Track” signals or other mechanisms that might enable consumers to opt out of tracking on the Site or Services.

International Users

If your Child is located outside the United States and your Child provides Personal Information to us, we may transfer such Personal Information to the United States and process it there (or any other country where we operate). By providing verifiable parental consent, you consent to the collection, transfer, use, storage and disclosure of such Personal Information as described in this Children’s Privacy Policy.

Changes

Any information that is collected is subject to the Children’s Privacy Policy in effect at the time such information is collected. From time to time, we may modify our Children’s Privacy Policy. If we make any changes, we will notify you of such changes by changing the Last Revised date and posting the new Children’s Privacy Policy on the Site. If we make any material changes to this Policy, we will notify you of such changes and request verifiable parental consent in those instances in which we are legally obligated to do so. IF WE HAVE NOT RECEIVED SUCH VERIFIABLE PARENTAL CONSENT TO SUCH CHANGE WITHIN THIRTY (30) DAYS, WE WILL NO LONGER ALLOW YOUR CHILD TO USE GAME LEARNING, and we will indicate when such changes will become effective.

Contact

You may contact us regarding this Children’s Privacy Policy and our privacy practices at:

Game Learning, LLC
8306 Wilshire Blvd #545 Beverly Hills, CA 90211

info@gamelearning.co