

PRIVACY POLICY FOR CHILDREN

Effective Date: January 20, 2020

Thank you for visiting a BitOGenius, Inc. (“BitOGenius”) property. BitOGenius values the privacy of children and of all of its users. This Privacy Policy for Children (<http://bitogenius.com/privacy-policy>) contains important information for parents and teachers about how we collect, use, and disclose the personal information we collect from children aged thirteen (13) years and younger who use our websites, games, services and applications (collectively, the “BitOGenius Services”). For the purposes of this COPPA Policy, “child” or “children” means a child or children aged 13 and younger.

Service Description

6. CHANGES TO THIS PRIVACY POLICY. We may make changes to this Policy from time to time. We will post any changes at the top of this policy. If we make any material changes to this COPPA Policy, we will endeavor to provide parents and children with notice in advance by sending notice to the parent’s, teacher’s, or school administrator’s email address of record prior to making the change.

1. INFORMATION WE COLLECT ABOUT CHILDREN. We collect information about children directly from children; from parents, teachers, and school administrators; and automatically through a child’s use of BitOGenius Services. We may combine information automatically collected with other information that we have collected about children. Please see our Privacy Policy (<http://bitogenius.com/privacy-policy>) to learn more about our information collection practices.

Although children may use certain components of BitOGenius Services, we have designed BitOGenius Services such that parents, teachers, or school administrators must create an account or provide consent before their child can access BitOGenius Services, and we generally do not require or collect personal information directly from children.

When creating an account, children are asked to create a username and provide their parent’s email address. The parent’s email address is used to seek consent and not used for any other purpose once consent is obtained. Once the account is created, we may use the parent’s email for a password reset request or other account admin purposes.

Usernames are moderated to prevent the collection of personal information. However, no method is foolproof and encourage parents and teachers to educate their children about limiting the types of personal information that their children provide over the Internet, including to us.

Children are able to create games within the service by uploading photos of game assets. These assets and photos are moderated to prevent the collection of personal information. All games are reviewed before being posted to the community.

2. CONSENT

Children are able to access a restricted version of the services prior to their parent or educator providing consent. The restricted version does not permit children to share or disclose their username or creations or interact within the community.

We use the parent email address collected at registration to deliver notice and seek the parent's active opt in to their child's use of the service. Parents will be asked to verify via third party, KWS by providing an email address and verification information that includes some but not all of the following: parent's name, date of birth, mailing address, credit or debit card information, a personal identity number (such as a CPF number in Brazil, a CURP number in Mexico, certain digits of a RRN number or i-PIN in the Republic of Korea, and certain digits of a US social security number in the US), a cell phone number, face scan, a government-issued identity document, or a photo.

Schools are required to enter an agreement confirming that the school administrator has the authority to provide consent on behalf of the parent. The school will notify parents in writing of their right to request to review, delete or prevent the further collection of their child's personal information as well as our information collection and use practices.

3. INFORMATION WE COLLECT AUTOMATICALLY. We automatically collect information about a child's use of BitOGenius Services through cookies and other technologies, including without limitation: domain name; browser type; browser language; operating system type; device name and model; pages or screens viewed; links clicked; as well as when and the length of time spent using Services. We also may collect IP addresses and other unique identifiers from children, as well as information about a child's activities within BitOGenius Services, such as which games s/he plays, photos taken with the Services, and download history, but we will only use such information to provide BitOGenius Services and to understand user activity while using BitOGenius Services.

4. SERVICE PROVIDERS USED IN RELATION TO CHILDREN

We use the following service providers to help us improve and better understand the child's use of the services. We do not use the information collected to contact a specific individual, amass a profile of a user or to serve behavioural ads.

- We use BugSnag for bug and crash reporting. Bugsnag does not collect personal information.
- We use Google Firebase for analytics. Firebase collects an IP address to determine coarse location before being promptly discarded.
- We use Google Ad Services and Unity Ads to deliver contextual ads. These services collect an IP address, advertising identifiers and a Device ID for fraud prevention and frequency capping. Unity Ads does not store this data for longer than 13 months.
- We use Singular for attribution to measure ad campaign success and have implemented a restricted version to prevent the disclosure of a child's personal information. Singular

collects a device ID, advertising ID and an IP address to deliver the service. This information is not retained.

- We use Firebase and Apple Push Notification Service to deliver remote push notifications. This requires the collection of a device token that is considered online contact information. This identifier will not be used for any other purpose and will be **retained as long as the account is active.**

Users and parents that have questions about our use of service providers can contact us at privacy@bitogenius.com.

5. HOW WE USE CHILDREN'S INFORMATION. We use the information we collect via the Services, in order provide BitOGenius Services, to tailor BitOGenius Services, to respond to requests, and as otherwise set forth in our Privacy Policy (<http://bitogenius.com/privacy-policy>). Note that we will not send marketing communications to children and any and all advertisements displayed on the Services are COPPA compliant.

6. HOW WE DISCLOSE CHILDREN'S INFORMATION. We do not sell or rent the personal information we collect from children to third parties or permit third parties to use such information for marketing purposes. In general, we may disclose the personal information that we collect about children to provide BitOGenius Services, to comply with the law, to protect BitOGenius and other users of BitOGenius Services, and as otherwise set forth in our Privacy Policy (<http://bitogenius.com/privacy-policy>).

7. DATA RETENTION AND DELETION

Account information and creations are stored for as long as the user's account remains active. Accounts are deemed inactive after 2 years for free users and 3 years for paid users of inactivity, or upon expiration of the school agreement.

Parents of children using BitOGenius Services at home can request to review, delete or prevent the further collection of their child's information at any time. Parents of children using BitOGenius Services at the direction of a teacher or school should contact the appropriate official at the child's school to request to review, delete or prevent the further collection of their child's personal information.

Parents, teachers, schools and libraries have a right to review the information we have collected about their children or students, to delete it, and to tell us to no longer use a child's personal information. Parents, teachers, and school administrators can review most of the information we collect about their children and students by logging in to their account, reviewing their account information, and updating the information we maintain about the child – or by contacting us email at privacy@bitogenius.com to request access to, request that we no longer use, or delete a child's personal information. To make such a request, please include your name, the child's username, and your email address, and specify clearly the action you would like us to take. We will comply with your request as soon as reasonably practicable. Please note that copies of information that a parent or administrator has updated, modified, or deleted may remain viewable in cached and archived pages of the Services for a period of time. If a parent, teacher, or school administrator does not want us to collect and use his/her child's personal information anymore, then the parent,

teacher, or school administrator may cancel his/her account and his/her child's use of the Services.

8. SECURITY

7. CONTACT US. If you have any questions or concerns please email BitOGenius at privacy@bitogenius.com or you can write to us at BitOGenius, Inc., 333 Mamaroneck ave PMB 394, White Plains, NY 10605.