Privacy Policy and Personal Data Processing Statement

Throughout this document, "Company", "We", "Us", "Our" and "Ours" refer to:

- "Kids 360" Ltd.
- email: <u>support@kids360.app</u>

Please carefully read our Privacy Policy and personal data processing of "Company".

If you do not agree with the Privacy Policy and do not give your consent to the personal data processing, do not click "Continue" and do not use the Service. Following the principles of good faith and acting in your interest, if you clicked the "Continue" button, it is considered that you have agreed with all the provisions of this Statement without any exception and give your consent to the personal data processing.

Protection of personal data of all Persons registered on the website is of paramount importance to the Company. In order to ensure such protection and taking into account the requirements established by General Data Protection Regulation (GDPR), which is a legislative act adopted by the European Union (EU) and encompassing a large number of issues, the legislative act that entered into force on May 25, 2018 and the Federal Law "On Personal No. 152" dated July 27, 2006, as well as the other regulatory legal acts of the Russian Federation in the field of personal data protection and processing, aimed at giving citizens more effective control over their data, we provide You with the information. The Company is obliged to respect the rights of all Persons registered on the website in accordance with the applicable personal data protection laws on the basis of which the Company operates.

General terms

This Privacy Policy Statement (hereinafter – "Regulations") is an official document of the Company - the owner of the rights to use the service "Kids360 for parents" and "Kids360" apps.

The Company determines the procedure of processing and protecting information regarding the individuals (hereinafter - " Users") using services, information, software located at the domain name https://kids360.app

In the event of any claims regarding the use of personal data, or if you have any questions regarding your personal data, you can contact the Company at any time at: 614066 Perm, Perm Krai, st. Stakhanovskaya, 54, Building P, "Technopark Perm", support@kids360.app

Observance of confidentiality is important for the Company and the purpose of this Privacy Policy is to protect the rights and freedoms of a person and citizen while processing his/her personal data, including the protection of privacy, personal and family secrets, from any unauthorized access and disclosure.

This Privacy Policy governs the processing of personal data and personal information (personally identifiable information and any other information related to this) about the individuals who consume the Content or are a User of the Company's Service.

This Policy applies to the personal data processing collected by any means, both active and passive, both via the Internet and without its use, from any persons anywhere in the world. We are committed to protecting your privacy.

This Privacy Policy explains our practice of collecting, using, disclosing and protecting information that is collected via our mobile software and our website (collectively, our "Service"), as well as your choices regarding the collection and use.

How we collect and use information

We collect and use the following types of information regarding the Parents who use the "Kids360 for parents" app: when you create a profile in the "Kids360 for parents" app, we may collect your personal information, such as the user first and last name, email address, cell phone number, we also request and use your geolocation data but only one once - at the time of the first login to the app.

- access to the device usage statistics – in order to display information about the usage percentage of other applications on your child's phone exclusively in the confirmed parent's application.

The "Kids360" service is used by the Child only by the consent of the Parent, agreeing to this Privacy policy, the Parent consents to the collection, processing and storage of the personal data of the Child. If a parent wants to add children under the age of 13 to his/her profile, the Parent must additionally fill in the parental consent form in accordance with the Children's Online Privacy Protection Act (COPPA) of 1998. The parental consent form can be found here – <u>Parental consent form</u>.

Then the child is able to use the "Kids360" Service connected to the Parent profile. The personal information of the child is only available to the Parent in the "Kids360 for parents" app. Upon the Agreement, the Company may collect, use the personal information of the child, as described in this Privacy Policy, without transferring it to any third parties.

The parent may contact us in order to review and / or delete any personal information the Company has collected regarding the child or cancel permission to collect the additional information regarding the child. Please contact us at support@kids360.app if you have questions about your child's profile.

Technical support and cookies

The Company collects information when you communicate using the "Kids360" app. The Company may also save any messages you send to us.

We use this information in order to operate, maintain and provide you with the functions and functionality of the Service and to communicate with you, for example, to send you notifications of your child's movements, etc. You can control the receipt of emails and text PUSH notifications by visiting Settings in the mobile app. We can also send you app messages (for example, confirmation of a profile, notification of parental consent, confirmation of an order, change or update of the features of the Service, technical and security notifications).

Information that we automatically collect using the technology when you visit our website or use our mobile software, we and our business partners may collect certain information about your PC or device using technologies such as cookies, web cookies, log files or any other tracking / recording tools. The information we collect using the tracking technologies includes but is not limited to the IP address, browser information, links to / exits and URLs, streaming data and information regarding how you interact with the web links, website, mobile software or Service, domain names, landing pages, page views, cookies data which allow us to uniquely identify your browser and monitor the behaviour of your browser at our website, type of mobile device or other permanent identifiers and location data collected from your mobile device. Some or all of this data may be combined with other personal identifying information specified above. When you access our Service via a mobile device, we may receive or collect and store unique identification numbers associated with your device or our mobile app (including, for example, UDID, a unique identifier for advertisers ("IDFA")) device type, model and manufacturer, brand and model of the mobile operating system, phone number and, depending on the settings of your mobile device, your geographic location data, including GPS coordinates You (for example, latitude and / or longitude), WiFi location or similar information regarding the location of your mobile device. We use this information in order to:

- memorize the information so that you do not have to re-enter it during your visit or the next time you visit a website or login to the mobile app:
- provide personalized content and information including advertising
- track the location and movement
- diagnose or fix technology problems reported by our users or engineers related to specific IP addresses or user IDs.

The Company may also collect analytical data or use third-party analytics tools in order to help us measure the traffic and usage trends of the Service. These tools collect information sent by your browser or mobile device, including the pages you visit, the use of third-party apps, and other information that helps us analyse and improve our Service. Although we are doing our best to respect the privacy preferences of our users, we cannot respond to "Do Not Track Signals" signals from your browser at this time.

Information exchange

We will not disclose personal information to any third parties (including law enforcement, other government agencies, or civil plaintiffs) unless such is required by the law or a court order.

How we protect your information

The Company takes precautions - including legal, organizational, administrative, technical and physical in order to protect the personal data of the User from any unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

When you use some products, services or apps of the Company or share entries on forums, in chat rooms or social media, the personal data you provide are available to the other users and can be read, collected or used by them. You are responsible for providing this information. For example, if you enter your name and email address in a forum post, such information is public. Please take precautions when using these features.

Your choice about your information use

You may refuse to provide any personal information through the Support Service, in which case the Company is not be able to provide you with the Services.

Change of account information and settings:

You can change the account information, update or modify your personal information by logging in to your account. You can also stop receiving promotional emails from us by clicking on the "unsubscribe" link provided in such emails. We take every effort to promptly process all requests for cancellation. You cannot deactivate the messages related to the Service (for example, account verification, notification of parental consent, order confirmation, change or update of the Service features, technical and security notifications). If you have any questions regarding viewing or changing your profile, you can contact us directly at support@kids360.app.

Information is collected by means of the cookies or similar tracking technologies. You can "refuse" the collection of information using the cookies or other tracking technology, in the settings in your browser or mobile device. Refer to the technical information of your browser or mobile device for instructions on how to delete, disable and / or restrict the use of cookies or other tracking / recording tools. Depending on your mobile device, you may no longer be able to control all tracking technologies via the settings of your device but you can uninstall the app if you do not want the tracking information to be automatically collected. You can also limit interest-based advertising via the settings in your browser or device. If you have any questions regarding third-party tracking and advertising, you can contact us directly at support@kids360.app.

Links to third-parties websites and services

The Company is not responsible for the practices used by the websites related to the Service, as well as the information or content contained in it. Remember that when you use the link to go from the Service to another website, our Privacy Policy does not apply to third-party websites or services. Your viewing and interaction on any third-party website or service, including those that have a link to our website, is subject to its own rules and third-party policies. Before proceeding, review these rules and policies.

Changes of the privacy policy

The Company may, at its sole discretion, modify or update this Privacy Policy. Upon new changes applying The Company must notify you either by giving prior notice of these changes before making the change, or by sending you a direct notice.

In order to make sure that your personal data is safe, we communicate confidentiality and security standards to the Company's employees and strictly monitor the implementation of confidentiality measures within the Company.

If you have any questions regarding the Company's Privacy Policy or the processing of data by the Company, you can contact us at any time.

You have the right to send the requests to the Support, including the requests regarding the use of their personal data, to send revocation of consent to the processing of personal data in writing to the address specified in the General terms section of this provision or by sending of a request.

We will obtain prior parental consent if any changes we make to this Policy affect users under the age of 13 in a way that requires such consent under COPPA.

This privacy policy and personal data processing latest modification is done on November 13, 2020.