



## Privacy Policy

Effective Date: Feb 10th, 2020

Skipy is founded on the principle of improving creativity in children and we are committed to providing an educational, entertaining, and safe service for kids and parents. We know that you care about how your family's personal information is used and shared, and we take your privacy and safety very seriously. We are extremely sensitive to family and educator concerns about their and their children's personal information and safety.

We will never include any pop-up ads or other advertisements directed at children.

This Privacy Policy describes the ways in which Skipy interactive private limited. ("Company," "we," "us" or "our") collect, use, and disclose information about you and the children who use your account through the Skipy Mobile App or Playskipy.com, and any other websites, applications and online services that link to this policy (collectively, the "Services").

By downloading, accessing, using and/or interacting with our Services, you agree and expressly consent to our collection, use and disclosure of the information that you provide as described in this Privacy Policy. If you have any concerns about providing information to us or the use of that information as described in this Privacy Policy you should not use our Services.

**THIS IS A BINDING AGREEMENT BETWEEN YOU AND COMPANY. BY USING THE SERVICES, YOU AGREE TO THE TERMS AND CONDITIONS IN THIS PRIVACY POLICY**

AND THE TERMS. THIS PRIVACY POLICY CONTAINS IMPORTANT INFORMATION ABOUT COLLECTION OF PERSONAL INFORMATION FROM CHILDREN UNDER THE AGE OF THIRTEEN. PLEASE READ THIS POLICY CAREFULLY BEFORE ACCESSING OR USING THE SERVICES.

This Privacy Policy explains how the Company may collect, use, and disclose information we obtain through our website or the skipy mobile app. As used in this Privacy Policy, “Personal Information” means information that alone or when in combination with other information may be used to readily identify, contact, or locate you, such as your name, address, email address, or phone number. We do not consider Personal Information to include information that has been aggregated and/or de-identified so that it does not allow a third party to easily identify a specific individual.

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### 1. Information We Collect

We collect information, including Personal Information, when you:

- register with and log in to our website
- use our Services, and
- communicate with us.

We also collect information, such as anonymous usage statistics, by using cookies, server logs, and other similar technology as you use the Service.

**A. Payment Information.** If you make any purchases through our website or mobile App, we may collect certain information regarding your purchase (such as your name and zip code) as necessary to process your order. You will be required to provide certain payment and billing information directly to our payment processing partners, including your name, credit card information, billing address and zip code.

**B. Using the Services.** We collect information that you submit to us through our website. For example, when you post comments, make a purchase, we will collect the information you include in these submissions, including any Personal Information.

**C. Messages.** We collect and process information you provide, including any Personal Information, in the context of composing, sending, or receiving messages through our Company's messaging function and we may collect information about your use of our Services. This includes testimonials, which may contain Personal Information.

**D. Customer Support.** We collect all information that you provide to us, including any Personal Information, when you contact us for customer support purposes.

**E. Location Data.** Once you register to the Skipy mobile app we may collect and process information about your location. This location information is being

collected based on your IP address and is restricted to the name of your city. Skipy is not using other technologies to determine your location (we do not use GPS, or other sensors). We do not collect location information about your exact whereabouts (i.e. name of the street or accurate address). When we have location information, we may use it to optimize our Services for you and others, allowing us to customize our website, understand and improve the services and develop new products, services or features.

**F. Cookies, Automatic Data Collection, and Related Technologies.** As you navigate through and interact with our website or mobile app, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our website or mobile app, including traffic data, location data, logs, and other communication data and the resources that you access and use on the website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically helps us to improve our website and mobile app and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our website and mobile app according to your individual interests.
- Speed up your searches. Recognize you when you return to our website or mobile app.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small text file containing a string of alphanumeric characters placed on the hard drive of your computer. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after

you close your browser and may be used by your browser on subsequent visits to the website.

- Flash Cookies. Certain features of our website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of our the website 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 and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- Google Firebase, an app development service ("Firebase") provided by Google Ireland Ltd. ("Google"). Firebase uses "cookies" or similar techniques- SDK, which are text files placed in your App and web browser. On behalf of Skipy, Firebase will use information from your device such as your Device ID, IP address, your IDFA or Google Play Services ID and your MAC address, and replace them with a unique code. When you use the Service we will measure the numbers of visits to the App, which pages you visit, your network connection, load times and when the app crashes. We use this information to evaluate and understand your use of the Service, to test and analyze performance and ultimately optimize our products and services.

Some content or applications, including advertisements, on the website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies to collect information about you when you use our website. 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 and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. For more information please contact us via [contact@skipy.co](mailto:contact@skipy.co)

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. However, if you refuse to accept browser cookies by activating the appropriate setting on your browser, you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our website.

## 2. How We Use Information

We use information collected from you to:

Provide, administer, and facilitate your use of our Services, including to display customized content; process or fulfill your request(s) and/or order(s) for products, services, information or features; display consumer surveys, communicate with you concerning your account by:

Responding to your questions or concerns;

Sending you administrative messages and information, those about changes to the Services, and updates to our Terms, and Privacy Policy;

Emailing you information or providing in app messages about your rewards programs, new services, new features, promotions, newsletters, which you can opt out of at any time; Sending push notifications to your wireless device to provide updates and other relevant messages. You can manage push notifications from the "options" or "settings" page for the mobile application.

Understand and improve the services and develop new products, services or features;

Enable user-to-user communication and interaction;

Manage your account preferences, establish your profile and registration information;

Facilitate the technical functioning of our Services, including without limitation to troubleshoot and resolve issues, secure the Services, and prevent fraud and abuse;

Respond to customer support questions and issues and resolve disputes; Create, review, analyze and share technical information; Analyze trends and user traffic, track purchases and usage information; Advertise our Services on third party websites or mobile applications; Market, process or fulfill promotions administered or sponsored by us; Solicit feedback from users; As required or permitted by law; As we, in our sole discretion, otherwise determine to be necessary or required to ensure the safety and/or integrity of our users, employees, third parties, members of the public, and/or our Services; Identify unique users across devices; or Tailor advertisements across devices.

**Aggregate Data.** We may de-identify and aggregate information collected through the Service and use it for any lawful purpose.

**Child User Information.** Information collected from Child Users may be used:

To measure a Child User's performance in activities and to adapt a Child User's learning experience to the Child User's learning needs.

To analyze, provide progress reports on, or provide an assessment of a Child User's performance.

Information collected from Child Users is never used to market to Child Users. Specifically, Personal Information collected from Child Users will never be used to serve targeted advertising, to build behavioral marketing profiles, or be shared with independent third parties for marketing purposes.

**Both Adult and Child User Information.** Information collected from both Adult and Child Users may be used:

- To allow us to assess and improve the Services, its educational content, and other services we provide, for example, to improve our content and user

experience; to research, evaluate, and improve the Services' educational efficacy; and to inform our understanding of the Services' user base.

- To customize, adapt, and personalize users' viewing and content-consumption experience, for example by measuring a Child User's performance in activities and adapting the Child User's learning path to his or her learning needs. To maintain and analyze the functioning of the Services.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to detect violations of and enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates, including the security of the Services; (f) to protect our rights, privacy, safety, or property, or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

### 3. When We Disclose Information to Third Parties

We will share your information which may include registration information, profile information, shared content and location information with the following third parties or under the following circumstances or as otherwise described in this Privacy Policy:

**Online Forums.** If you post information in a Company forum, that information may be viewed by any Site Visitor or Registered User who accesses the forum.

**Third Party Business Partners, Service Providers, Contractors or Agents.** We may share your information with third party companies that perform services on our behalf, including for payment processing, order fulfillment, video conferencing, scheduling, data analysis, marketing services, advertising services (including but not limited to retargeted advertising), email and hosting services, services that process and administer consumer surveys, and customer services and support. We may also share your information with third party companies that we partner

with to provide certain services to you in connection with the Services. Those partners' collection and use of information is subject to their privacy policies and other terms. You should review such privacy policies, terms, and other agreements.

**Analytics and Data Enrichment Services.** We use third-party analytics to help understand your usage of our Services and to improve our Services. We may provide your contact information, registration information, technical information, usage data, or de-identified data or to data enrichment services, which match such information with publicly available database information, including contact and social information from other sources, such as your email address, gender, company, job title, photos, website URLs, social network handles and physical addresses. We use this combined information to communicate with you in a more effective and customized manner.

**Marketing.** We do not rent, sell, or share Personal Information about you with other people or non affiliated companies for their direct marketing purposes, unless we have your permission. The Services may allow you to opt-in to receive communications from third parties. If you give us your permission to share your Personal Information with such third parties, then you may receive communications from such third parties and you are solely responsible for your engagement with such third parties.

**As Required By Law and Similar Disclosure.** We may access, preserve, and disclose your Personal Information or other account information if we believe doing so is required or appropriate to (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our or others' rights, property, or safety.

**Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy or liquidation where the business will not continue as a going concern, receivership, sale of the Company's assets, or transition of the Services to another provider, then your information may be sold or transferred as part of such a transaction as permitted

by law and/or contract. The use of your Personal Information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable Personal Information was collected.

**Consent.** We may also disclose your Personal Information with your permission.

## 4. Security

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Please be aware, however, that no information system can be guaranteed to be 100% secure, so we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to the Services over networks that we do not control, including the Internet and wireless networks. If you have reason to believe that your interaction with us is not secure, please contact us at [contact@skipy.co](mailto:contact@skipy.co)

## 5. Children's Privacy

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform you, as parents and legal guardians (as used in this section, "parents") about our practices for collecting, using, and disclosing 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 our website. This section only applies to children under the age of 13 and supplements our general privacy policy. Only the other provisions of this Privacy Policy applies to teens and adults.

**Information We Collect from Children.** Children can access some parts of our services and its content and use some of its features without providing us with Personal Information. However, most content and features of the Services are available only to the registered accounts and require us to collect certain information, including Personal Information, from them. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use our services.

We only collect as much information about a child as is reasonably necessary for the child to participate in the activity in our Services, and we do not condition his or her participation on the disclosure of more Personal Information than is reasonably necessary.

**Automatic Information Collection and Tracking.** We use technology to automatically collect information from our users, including children, when they access and navigate through the service and use certain 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 and across different services
- Information that identifies a device's location (city and country).

We 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 Cookies, Automatic Data Collection, and Related Technologies section in this Privacy Policy.

**How We Use Your Child's Information.** We use the Personal Information we collect from your child to:

- register with and log in to our service.
- We use the information we collect automatically through technology and other non-personal information we collect to improve our website and to deliver a better and more personalized experience by enabling us to:
- Estimate our customer size and usage patterns.
- Store information about the child's preferences, allowing us to customize the content according to individual interests.
- Speed up your 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. In addition, we may disclose children's Personal Information:
- To third parties we use to support the internal operations of our website or Services and who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- To law enforcement agencies or for an investigation related to public safety.
- 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 Company, our customers or others, including to: protect the safety of a child; protect the safety and security of the website or Services; or enable us to take precautions against liability.

**Accessing and Correcting Your Child's Personal Information.** At any time, you may review the child's Personal Information maintained by us, require us to

correct or delete the Personal Information, and/or refuse to permit us from further collecting or using the child's Personal Information.

You can review, change, or delete your child's Personal Information by sending us an email to [contact@skipy.co](mailto:contact@skipy.co). 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.

## 6. How to access, Change or Delete Account Information

An Adult User can review or change the information they provided when registering for the Services, including by removing Child Users to the Account by emailing Company support. In addition, at any time, Users may contact us to request that we provide for their review, or delete from our records, any Personal Information they have provided about Child Users associated with their Account, or to cease collecting Personal Information from those Child Users, as applicable. Please keep in mind that a request to delete Personal Information may lead to cancellation of your Account.

When we change or delete any Personal Information at your request, we will make good faith efforts to make the changes in our then active databases as soon as reasonably practicable. Changing setting options may not result in immediate changes to the settings, which are subject to our operations and maintenance schedules.

## 7. Links to Other Services

In certain sections of the Services, we may include links to external websites or applications (for example, Facebook and Amazon). These websites and applications are governed by their own privacy policies or information collection practices, which may be substantially different from ours. We encourage you to review the privacy policies and information collection practices of those linked websites and apps, as those parties' practices are not subject to this policy.

## 8. International Users

We store information about users on servers primarily located in the United States and we may also store such information on servers and equipment in other countries. If you are accessing our Services from outside of the United States, please know the data and personal information you submit may be transferred to and stored on servers in the United States or other countries. The data protection and other laws of the United States and/or other countries might not be as comprehensive as those in your country. By submitting your data and/or using our Services, you consent to the transfer, storing and processing of your data in and to the United States and other countries where we may choose to store data.

## 9. California Specific Terms

California residents have the right to receive, once a year from us: a) information identifying any third party company(ies) to whom we may have disclosed (within the previous calendar year) your Personal Information for that company's direct marketing purposes; and b) a description of the categories of Personal Information disclosed. If you are a California resident and wish to obtain such information, submit a request to us at [contact@skipy.co](mailto:contact@skipy.co) with "Request for California Privacy Information" as the subject line and in the body of your message. Only information required to be disclosed by law will be included in our response.

We are committed to providing you with meaningful choices about the information collected on our Services for third-party purposes, and that is why we provide information and choices discussed throughout this Privacy Policy. However, we do not recognize or respond to browser-initiated Do Not Track signals, as the Internet industry is currently still working on Do Not Track standards, implementations and solutions.

## 10. Specific terms for EU users

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union. It also addresses the export of personal data outside the EU. The GDPR

aims primarily to give control to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU. It is enforceable since 25 May 2018. The GDPR replaces the 1995 Data Protection Directive.

### **10.1. Controller identification**

We inform you that the provided data will be processed by Skipy Interactive Private Limited, (hereinafter as the “Controller”) with the following purposes: You can contact the Controller through the following email address: [contact@skipy.co](mailto:contact@skipy.co).

### **10.2. Purposes**

To know more about what what categories of data we collect and how we use the information we collect, please go to section 1 and 2 of Privacy Policy

### **10.3. Lawfulness of processing**

The legal basis for the data processing is the user's consent to it. This consent is requested through Controller’s forms during the registration - web or app.

### **10.4. International transfer.**

We store information about users on servers primarily located in the United States and we may also store such information on servers and equipment in other countries. If you are accessing our Services from outside of the United States, please know the data and personal information you submit may be transferred to and stored on servers in the United States or other countries.

### **10.5 Service Providers**

Skipy Interactive Private Limited. uses a variety of third party service providers to help us provide services related to our services. Service providers may be located inside or outside of the European Economic Area (“EEA”). We hold Data Processing Agreements (DPA) in place with all the third party services, that guarantee that adequate safeguards are put in place with respect to the protection of such Personal Data as required by EU’s GDPR Data Protection policies. We do not sell personal information to third parties.

### **10.6 Your Rights**

The people who provide us with any personal data have the following rights:

- **Right of access:** The data subjects shall have the right to obtain from the Controller confirmation that their data are processed properly and they shall have the right of access their personal data.
- **Right to rectification of information:** The data subject shall have the right to obtain from the Controller without undue delay the rectification of inaccurate personal data concerning his or her.
- **Right to erasure (to be forgotten):** The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her.
- **Right to restriction of processing:** The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:
  1. the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data;
  2. the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
  3. the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- **Right to data portability:** The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to a controller, and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. Please have in mind that this right will not be enforceable to:
  - The third parties' data that you have provided to the Controller.
  - The data that concerns you, but has been provided to the Controller by third parties.

- **Right to object:** The data subject shall have the right to object to processing of personal data concerning him or her. You shall be able to object to the commercial communications submitting. You can exercise this right by sending us an e-mail to the following address: [contact@skipy.co](mailto:contact@skipy.co).

### 10.7 Authorities

At Skipy Interactive Private Limited, we are committed to take data protection very seriously. Check the Spanish Data Protection Agency website for more details about your rights. Additionally, we inform you about the possibility to make a claim before the competent control authority if you believe that your exercise of your rights was not satisfactory enough: the Agencia Española de Protección de Datos (C/ Jorge Juan, 6. 28001 – Madrid. phone number: +34 901 100 099). More info at <http://www.agpd.es/>

## 11. Changes to Our Privacy Policy

**Posting of Revised Privacy Policy.** Because we are always looking for new and innovative ways to help your family's educational needs in connection with the use of our Services, this Privacy Policy may change over time. The effective date at the top indicates the last time this Privacy Policy was modified. If we modify the terms of this Privacy Policy we will post a notification on our Services. Your continued use of our Services after such changes are made shall constitute your acceptance of such changes and will be subject to the then-current Privacy Policy. If you cease to use our Services after such changes, your discontinued use shall not constitute acceptance of such changes and such changes shall not apply to you. Any revised Privacy Policy will supersede all previous privacy policies.

**New Uses of Personal Information.** From time to time, we may desire to use Personal Information for uses not previously disclosed in our Privacy Policy. If our practices change regarding previously collected Personal Information in a way that would be materially less restrictive than stated in the version of this Privacy Policy in effect at the time we collected the information, then we will make

reasonable efforts to provide notice and obtain consent to any such uses as may be required by law.

## 12. Contact Us

Skipy Interactive Private Limited, located in India, is the operator of the Services. Questions regarding this Privacy Policy and issues related to you or a Child User's information for which you are responsible should be directed to us via any of the following methods:

Mailing address: #806, 10th A Main Rd, Stage 1, Indiranagar, Bengaluru, Karnataka 560038, India.

Attention: Legal Department

Phone: (+91) 9972247778

Email address: [contact@skipy.co](mailto:contact@skipy.co)