

## PRIVACY POLICY

The Learning Network, LLC d/b/a “The Learning Bridge” and its affiliated entities (collectively, “The Learning Bridge”, “TLB”, “we”, “our”, or “us”) respects the privacy rights of our online users and is committed to protecting the personal information collected about or provided by you. We have adopted this online privacy policy ('Privacy Policy') to guide how we process (i.e. collect, record, organize, structure, store, adapt or alter, retrieve, consult, use, disclose by transmission, disseminate or otherwise make available, align or combinate, restrict, erase or destruct) the personal information you provided to us with respect to our websites ('Websites'), our pages or presence on third-party websites, our games, our mobile applications ('Applications') and other products and services that we offer from time to time ('Game(s)', collectively “Service” or “Services”), and how you can exercise your privacy rights.

Please note that this Privacy Policy applies only to information submitted to and collected by TLB through use of the Web & App Games and Services on our Websites or the following platforms (collectively, 'Third-Party Platforms' or 'Serviced Platforms'): Facebook Web/Canvas Games, Facebook Pages, Apple iOS App Store, Google Play Store, Amazon App Store or other third-party application/platform for supplying our Services. This Privacy Policy does not apply to information that may be collected offline. Moreover, this Privacy Policy applies to the Service, but not to websites maintained by other companies or organizations to which we may provide links. When you link to these websites, this Privacy Policy no longer applies. We are therefore not responsible for the content or activities provided or created on such sites.

This Privacy Policy applies when you use our Service. Please read it before using our Service.

By using and accessing the Service provided by TLB, you signify your acceptance to our Privacy Policy. If you do not agree to this Privacy Policy or do not want TLB to process your information in the ways described in this Privacy Policy, please do not use our Service.

### **Information We Collect from You**

We will collect and store any information that you provide to us, including when you create your account or a player profile while using our Games and Services in the Websites or Applications.

### **Information about you that you give us directly**

While you use our Games and Services, you may give us your information directly (like when you are setting up your account), and we will store such information on our databases and use it for the purposes described in this Privacy Policy. When you use our Games and Services you may give us the data like first and last name, nickname, gender, age, e-mail address; or other information that helps us make sure it is you accessing your account or helps us improve our Services. You may also create a player profile in our Games which other players can see, and which may include the data like profile photo (for example while connecting by Facebook), first and last name, nickname, gender, age, physical location data that you provide, player ID that is created by us and used to identify your game account.

### **Information about your contacts**

When you connect to our Games and Services by Facebook, we may also collect information that you provide us about your Facebook Friends' List but be sure to ask their permission first.

### **Data generated using our Games and Services**

When you use our Games and Services, we collect information about the ways in which you use and interact with our Games, such as when and for how long you play, game features and other players you interact with, purchases you make, progress or levels you achieve, and other gameplay activities. If you choose to use communication features in Services that allow you to communicate or share information with other players, then we would collect information on what is communicated or shared. This may include your in-game actions like participation in player clubs, public posts or comments on other players' profiles, non-public messages or invitations to other players, chats with other players, events in our Games. We may access in real-time, record, and/or store archives of these communications, comments, and other user-generated content on our servers to make use of them to protect the safety of our players or users; to protect our rights and property in connection with our Services; to conduct research; to operate, improve, personalize, and optimize our Services and our players' experiences, including through the use of analytics; and to manage and deliver (tailored) advertising. Where required by law, we will seek your consent for this.

### **Payment data**

We also collect data related to any purchases you make. If you purchase in-game virtual currency, our third-party payment partners will collect the billing and financial information it needs to process your charges. This may include your postal address, e-mail address, and financial data. Our payment partners do not share your financial information, like credit card numbers, with us, but they may share non-financial data with us related to your purchases, like your name, and the items purchased. When you play our Games and Services connected Third-Party Platforms, any purchases you make will be processed by such Serviced Platforms and subject to that Serviced Platforms' terms of service and privacy policy. For these purchases, TLB does not receive your financial data, but may receive non-financial information related to your purchases, like your name and the items purchased. The information TLB receives depends on our Games and Services you are playing and the Third-Party Platforms.

### **Support correspondence**

When you ask for help from our support team, we may collect and store the contact information you give them (generally, your name, e-mail address, player ID), data about your game play or your activity in a Game. We will also store the communications you have with our support and any additional information in those communications in order to provide support and improve the Services. We also automatically collect additional types of data, such as your IP address and data sent by your device to provide and improve their service. We may use the service support partners and, in that case, as a safeguard to protect your privacy, we will arrange a data processing agreements, where we ensure that your personal information is only used in accordance with our instructions and not for their own purposes or are used in accordance with the applicable law requirements or our contractual arrangements with our partners. The purpose of using the service support partners is to answer the extensive number of user requests we receive. Our support

processors help us to improve our customer service so that you can get a faster and helpful response.

### **Information about you from third-party advertising partners**

We may also receive personal information about you from our advertising partners. For example, if you clicked on an advertisement to direct you to one of our Services (such as an advert of one of our Games in other publisher's game), we will be provided with information from such ad network and advertising campaign.

### **Information about you from third-party service providers**

We collect some information from the third-party service providers including Third-Party Platforms for our businesses and operation and provide the Games and Services to you. The information we receive depends on our Game you are playing, the third-party service provider, your privacy settings, etc. For example, if you play our Games and Services through Third-Party Platforms, TLB may receive certain information about you from the Serviced Platforms: first and last name, profile picture, your user ID (Facebook ID), which may be linked to publicly-available information (public profile) like your name and profile photo, your friends' list and other public data, e-mail address you provided to that Third-Party Platforms, physical location and that of the devices you use to access our Services, gender, age, information about your activities on or through the connected Third-Party Platforms, other publicly-available data on the Third-Party Platforms; and/or any other information that you or the provider of the Third-Party Platforms share with us. If you access our Services from the Third-Party Platforms or connect our Services to the Third-Party Platforms, you should also read that Third-Party Platforms' terms of service and their privacy policy.

### **Other third-party sources**

We may collect data from other third-party sources. Where we do, we will let you know. We may collect or receive information about you from other sources like third-party data providers. We use this data along with information you provide us with directly, for example, to help you and your friends connect or to serve you by advertising more tailored to your interests.

### **Cookies**

Some of your information may be collected through cookies. Cookies are files with small amounts of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer's hard drive. We or our third-party partners may use cookies to collect your information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some options of our Service.

### **No special categories of information**

We do not request or intend to collect any 'special categories of information' such as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Kindly be cautious when sharing this information about yourself (or others) in our forums.

## **Use of Information collected and Legal Grounds for Processing**

We use the information we collect about you/your device from the Websites, Applications, Third-Party Platforms, third-party sources, etc. in accordance with the legal grounds for processing and this Privacy Policy.

### **Legal Grounds for Processing**

We use your information under several legal grounds including fulfilling our contract with you (i.e., Terms of Service), our legitimate business interests, complying with our legal obligations and your consent.

The use of the information we collect, and store is to provide you with the Games and Services you request from us and to improve your in-game experience, but there are other uses as well.

### **Use in General**

We use your information for the following purposes:

- Delivering and improving our Services. We use your information for developing, delivering, and improving our Games and Services, providing Games updates, technical troubleshooting, understanding, and analyzing trends in connection with usage of the Games, and administering the Games.
- Displaying advertisements. We use your information for showing advertisements for our Games and Services in other publisher's apps and for displaying third-party advertisements in our Games and Services.
- Cross-promotion. We use your information for cross promoting our Games and Services, meaning to promote one of our Games while you are playing different Games of ours.
- Tracking and fraud prevention for advertising purposes. We use your information for tracking how our advertising campaigns perform and for identifying and preventing fraud for our advertising campaigns.
- Analytics and research. We use your information for understanding and analyzing trends in connection with the usage of the Games and Services, gathering demographic information about our user base, data about where the Games were downloaded from. We may also create reports and analyses for the purposes of research or business intelligence, for example to track potential problems or trends with our Games and Services, or to test our new game features and content.
- Security. We use your information for enhancing the safety and security of our Games and Services.
- Customer Support. We use your information to provide customer support to you and to respond to your inquiries.
- Connection to other Players. We use your information to identify and suggest connections with other players or users, enable players or users to communicate with each other and personalize our Services to you.
- Communication with you. We use your information to communicate with you, including in-game updates and notifications, new Services, and promotional offers that we think might be of interest to you.

### **Use for In-App Purchases**

Our Games may enable in-app purchases. We do not process payments for in-app purchases nor have access to your credit card information. Payment transactions for in-app purchases are

completed through the third-party payment partners or Third-Party Platforms. Please review privacy policy and terms of service of such third-party payment partners or Third-Party Platforms.

### **Special Notes**

We reserve the right to remove any of your information or content from the Service if we receive a notice of intellectual property infringement or other complaint.

Note that whenever you give out personal information in public areas such as on our message board, that information can be collected and used by people you do not know. While we strive to protect those who wish to participate in these activities, we cannot guarantee the security and privacy of any information that you post in these areas, and you acknowledge this fact.

### **Information Sharing**

We share some of your information with your friends and other players or users that you are playing with to facilitate your in-game interactions. We may also share your information with third parties or allow third parties to collect this information from our Games and Services in the following manner:

#### **Third-party advertising partners**

We share some of your information with advertisers to tailor the advertisements you see when you use our Services to your interests. Offers are hosted by third-party offer wall providers, and the offers are made by third-party advertisers or by us (in case of showing our advertisements). We do not actively share personal information that directly identifies you with third-party advertisers for their direct marketing purposes unless you give us your consent. To enable advertisers and ad media partners to serve you with more relevant ads, they may collect, or we may collect and share with them, the following types of data when you use our games: performance data (like the number of clicks on an advertisement), certain technical information (like IP address, non-persistent device identifier and de-identified persistent device identifier; and/or a unique identifier. In addition to serving you with relevant ads, the data collected may be used to: measure how effective ads are, offer you targeted advertising (both on and off our games) in order to personalize your experience by showing you advertisements for products and services that are more likely to appeal to you (a practice known as interest-based advertising or behavioral advertising); and/or undertake web analytics to analyze traffic and other player activity to improve your experience. Ad networks may collect this data through the use of cookies and other similar tracking technologies, and they may use a single tracking technology or multiple tracking technologies at the same time. After clicking on a third-party advertisement, you may no longer be on a site or app controlled by us through

which you are playing our Games. If you do want to receive customized in-application advertisements from third parties, your consent will be required. The practices of third-party companies delivering advertisements in our Games are subject to those companies' own privacy policies.

#### **Third-party service providers**

We share your information with the third-party service providers and partners that we work with to bring you our Games and Services. We will share your information with third-party companies who perform services on our behalf, like analytics, analysis, hosting services, customer service,

marketing, and advertising optimization. We will also share your information with our third-party partners who assist us in delivering and optimizing our Services, such as the Third-Party Platforms. Where we share your information with third-party service providers and partners, we ensure that we have appropriate agreements in place to protect your information (as required by applicable data protection laws).

### **Other third parties**

We may share some of your information with other third parties if we have your consent to do so.

In addition to the sharing described above, we may share your information with other third- parties or allow them to collect your information from our Services in some ways not specifically described in this Privacy Policy if we have your consent to do so.

### **Security measures and mergers, etc.**

We share your information if necessary for safety, security, or compliance with law. Your information and the contents of all of your online communications in our Games and Services and between you and TLB may be accessed and monitored as needed to provide our Games and may be disclosed: to satisfy any laws or regulations that apply when we have to disclose the information in response to lawful requests by public authorities if our Games are being used in committing a crime or to share data with other companies and organizations for the purposes of fraud protection and other security precautions to protect the rights or property of TLB or applicable third parties.

In addition, in the event of a merger, acquisition, reorganization, bankruptcy, or other similar event, your information may be transferred to TLB successor or assign, if permitted by and done in accordance with applicable law.

### **Data Subjects' Rights**

#### **Accessing and Deleting Personal Information held by TLB**

You can request a copy of or deletion of your game account data by submitting a request through the Application itself or through our support team at [info@TheLearningBridge.net](mailto:info@TheLearningBridge.net). To review and update personal data in certain games, visit “settings” within that Applications. We will keep certain records where we need to, such as for legal or accounting purposes. We will also keep data in order to exercise, defend, or establish our rights.

#### **Managing Personal Information from Third-Party Platforms and from your mobile device**

To access, update and manage the information that we receive from Third-Party Platforms and from your mobile device, use the settings provided by the Third-Party Platforms and your mobile device. Once we receive your information from Third-Party Platforms or your mobile device, that data is stored and used by us in accordance with this Privacy Policy.

### **Opting in or out of Marketing Communication with TLB**

You may opt-in or opt-out of receiving additional communications, such as marketing emails or newsletters, from us by using the options provided in the game. You can unsubscribe from promotional emails by clicking the “unsubscribe” link. You can opt out of mobile push notifications in your device’s settings page. If you want to stop receiving push notifications, which are messages an app sends you on your mobile device even when the app is not on, you can turn

off push notifications by visiting your mobile device's "settings". Many of our games also offer the ability to turn off push notifications in the in-game "settings".

Please note that you may opt in or out of receiving marketing communications from us, but we may still communicate with you from time to time if we need to provide you with information about the Games you are using from us, if we need to request information from you with respect to a transaction initiated by you, or for other legitimate non-marketing reasons, for example, if we update this Privacy Policy, our Terms of Service or TLB End User License Agreement.

### **International Transfer**

If necessary, for our businesses and operation of the Services, all personal information collected via or by TLB may be stored and processed anywhere in the world on our servers or the servers of our service providers. When we transfer your information internationally, we will take reasonable steps to ensure that it is treated securely and lawfully according to this Privacy Policy. By providing information to TLB, you consent to the storage and processing of your information in countries other than the country in which you are resident.

### **Information Retention**

We'll keep your information for as long as necessary to provide you with the Services, maintain our legitimate business operations, and/or exercise, defend or establish our rights. How long we retain your information depends on why we collected it and how we use it, but we will not retain your information for longer than is necessary for our business purposes or for legal requirements.

We will retain and store the personal information about you and connected with your account and/or the Services you use from us for as long as you have an active account with us. We will take reasonable measures to delete this personal information if you delete your account. However, you acknowledge that we may retain some information after you have closed, or we have deleted, your account with us where necessary to enable us to meet our legal obligations or to exercise, defend, or establish our rights.

### **Security of Your Information**

We work to protect your information but you as a player or user also have to take certain steps. We implement commercially reasonable and appropriate security measures to help protect the security of your information and to ensure that your information is treated securely and in accordance with applicable laws. It is important that you protect and maintain your TLB account's security and that you immediately tell us of any unauthorized use of your account. Please be careful to keep your Facebook account information, including your social network account password, secure as well. We urge you to log out of your TLB account and any social network account you have used to access our Services when you are finished using them.

### **Privacy Policies of Linked Third-Party Services**

We are not responsible for the ways in which third-parties use your information (other than our partners acting under our guidance). Our Websites, Applications, Games and Services may contain advertisements from third-party services that may link to their own websites or services. We are not responsible for the privacy practices or the content of these parties. If you have any questions

about how these entities use your information, you should review their policies and contact them directly.

### **Our Policies Concerning Children**

Our Services are not directed at children under the age of 13 (or under the age of 16 in European Countries, collectively ‘Children’). Children are not permitted to use our Services, and we do not knowingly collect any personal information from them. For games that are not directed at Children but nonetheless may appeal to them, we take additional steps to limit access to these Services based on the player or user’s age. Though our Services do not target Children, we may collect age information before allowing a player or user to proceed for certain games.

If you want to be a player or user for our Services as Children, please ask your parent(s) or guardian(s) for permission before using or playing on the Service. If you have not obtained permission from your parent(s) or guardian(s), you should not use our Service.

If you are a parent or guardian and you are aware that your Children have provided us with the personal information, please contact us at [info@thelearningbridge.net](mailto:info@thelearningbridge.net). If we become aware that we have collected the personal information from Children without verification of parental consent, we will take steps to remove that information from our records.

### **Changes to our Privacy Policy**

We reserve the right to make changes to this Privacy Policy at any time.

If required by law, we will ask for your consent regarding such change. The most current version of the Privacy Policy will govern our processing of your information and will be available at [www.learningbridge.net](http://www.learningbridge.net) where you might want to periodically check for updates of this Privacy Policy.

For previous versions of this Privacy Policy, please contact us via [-info@thelearningbridge.net](mailto:info@thelearningbridge.net).

Your continued use of the Service will signify your acceptance of these changes.

### **Data Protection Officer and Contact Information**

TLB has a Data Protection Officer (‘DPO’) who is the person at TLB responsible for all matters related to data protection and privacy matters. The DPO is the designated contact for data protection issues for TLB. You can reach TLB DPO at the following address:

ATTN: Data Protection Officer The Learning Network LLC  
1915 Natchez Trace, Allen TX 75013 [info@thelearningbridge.net](mailto:info@thelearningbridge.net)

This Privacy Policy was last updated on September 9, 2023.