

Privacy Policy

This policy (together with our end-user license agreement as set out at EULA ('**EULA**')) applies to your use of our Luwi language practice mobile application (the "**Application**").

ABOUT THIS POLICY

This policy explains what personal data we collect, how and why we use it and what we do to keep it safe. It also sets out your rights in relation to your personal data. This policy is designed to ensure that your information is used in a fair, lawful, and transparent manner in accordance with TR and EU data protection laws ('**Data Protection Laws**').

This policy relates to 'personal data', which means any information which identifies or relates to you (or any other individual). It also uses the term '**processing**', which means any operation, action or activity (such as storage, transfer, access, deletion) which involves personal data.

WHEN WE COLLECT PERSONAL DATA

We collect personal data about individuals who register for or use the Application or communicate with us this includes information:

- provided to us by end users of the Application (for example, by filling in forms within the Application);

- We post your score to Apple Game Center leaderboard. The score and your personal information will not be collected or stored on our servers.
- generated or collected during the course of using the Application;

For further details about the information collected from and generated by the use of the Application, please see '*What personal data we collect and why*' (below).

WHAT PERSONAL DATA WE COLLECT AND WHY

We collect the following information about individual end users of the Application:

- Any feedback or opinions you provide to us about the Application or our services.

We use this information because to the extent necessary in order to fulfil our obligations under the EULA (i.e. to administer your account so you can access the Application content within it).

We also use information for our own lawful purposes, such as keeping proper records, administration of our business and in order to maintain and improve the Application and our services (which may involve the use of personal data and/or anonymised data).

In limited circumstances, we may use personal data on the basis of your consent. If we do so, we will always clearly ask for your agreement first. You

are, of course, free to refuse this and we will inform you as to what (if any) consequences this might have. You can also withdraw consent at any time.

We may also collect anonymous information about Application users in order to optimise and improve the Application and our services This might include IP addresses, device details and the connection type (for example, the Internet service provider used). However, none of this information will by itself directly identify any particular user. We use this information to track visits and pages used on the Application.

WHO HAS ACCESS TO YOUR PERSONAL DATA

Personal data you provide to us will be kept private and confidential. Our employees and contractors will be able to access information to the extent necessary for us to use it for the purposes explained earlier in this policy (such as providing you with access to the Application and its materials).

We will not disclose or share your personal data other data controllers without your permission. The only exceptions to this are those set out above and where we are legally required to disclose information, or in the event our business is sold and the Application and services are taken over by another company. We may also be required to share personal information with regulatory authorities in the event of an audit or investigation.

HOW LONG WE STORE PERSONAL DATA FOR

We only retain personal data for as long as is necessary for the purposes described in this policy (or for related compatible purposes such as complying with applicable legal, accounting, or record-keeping requirements).

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from its unauthorised use or disclosure, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

If you delete your account, or your licence to access the Application is terminated or expired then we will typically erase all information relating to you.

HOW WE KEEP PERSONAL DATA SAFE

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, damaged or destroyed, altered or disclosed. This includes both physical security measures (such as keeping paper files in secure, access-controlled premises) and electronic security technology (such as sophisticated encryption protocols, digital back-ups and anti-virus protection).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable supervisory authority of a breach when we are legally required to do so.

YOUR RIGHTS AS A DATA SUBJECT

Data Protection Laws provide you with certain rights in relation to your personal data. These are as follows:

- **The right to access your personal data.** This enables you to receive a copy of the personal data we hold about you.
- **The right to request correction or completion of personal data.** This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **The right to request erasure of your personal data.** This enables you to ask us to delete or remove personal data (though this may not apply where we have a good, lawful reason to continue using the information in question). You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **The right to object to processing of your personal data.** You can object to us processing personal data for legitimate interests purposes or for direct marketing.
- **The right to restrict how your personal data is used.** You can limit how we use your information (which means we'll restrict how we use the

data so that it's stored securely and will typically only be accessed in case of a legal claim).

- **The right to have a portable copy or transfer your personal data.**

We will provide you, or (where technically feasible) a third party, with a copy of your personal data in a structured, commonly used, machine-readable format. Note this only applies to automated information we process on the basis of your consent or in order to perform a contract.

- **The right to withdraw consent.** If we are relying on consent to process your personal data, you have the right to withdraw that consent at any time.

Responding: We try to respond to all personal data requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. Please also bear in mind that there are exceptions to the rights above and some situations where they do not apply.

We may need to request additional information from you to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you to clarify your request.

UPDATES TO THIS POLICY

We will update this policy from time to time. The current version will always be accessible from “Settings” section in Application. This policy was last updated on 2 April 2024.