

# PRIVACY POLICY

PikaPika Applications

*[Last Modified: January 7 , 2020]*

Floydwiz Technologies Pvt. Ltd. (together with its subsidiaries, affiliates, employees, officers and directors, as applicable – collectively “Company” “PIKAPIKA” or “we” or “us” or “our “) is a mobile-driven company that provides a kid-safe environment and family-friendly designated products and mobile technology, such as PikaPika Discover the Best application, an entertainment solution for kids that combines safety, engagement appropriate children’s content (“KID Mode App”) and other child-friendly mobile applications (collectively “App(s)” and together with the features and services provided therein shall be defined as the “Services”).

PIKAPIKA respects the privacy of its users (both parents and children, and collectively “you” or “user”). We believe it is important for you to make informed decisions regarding the use of our Services based on your understanding of what information we collect through the use of our Apps, what we do with such information, how we process it, with whom we share it, as well as your rights and choices regarding your information processed by us. For this purpose, we have drafted this privacy policy (“Privacy Policy”), which will further describe and detail our privacy practices while you use or otherwise interact with our Apps; but before that, we would like to explain the basis on which we process data:

- Where you sign up for any of our Services, we process personal data in order to perform our contract with you;
- If we have a legitimate interest in processing data, such as for direct marketing or online identifiers when you access our Website or interact with our Services, subject to applicable law provisions; or
- We will also process personal data where you have provided us with consent to do so.

For more details regarding the terms and conditions for use of the Apps, please read our Terms of Use (“Terms of Use”), a current copy of which is available at [Terms of Use](#) Note that this Privacy Policy is an integral part of the Terms of Use (collectively the “Agreement”).

## Children’s Information

Our Privacy Policy and our privacy practices adhere to the United States Children’s Online Privacy Protection Act (“COPPA”), as well as other applicable laws. We will not knowingly collect and store Personal Information directly from: (i) US resident children under 13 years of age without parental consent, except as permitted under COPPA; (ii) EU resident children under 16 years of age without parental consent, except as permitted under EU applicable law. If we believe that we have collected and stored Personal Information from a child (without the necessary parental consent or other legal basis to do so), we will delete the Personal Information provided as soon as feasibly possible. If you are aware that your child has provided us with Personal Information not in accordance with

the terms of this Privacy Policy, please contact us at:

[care@pikapikaapp.com](mailto:care@pikapikaapp.com).

To learn more about COPPA, we recommend that you review this simple [one-page informational guide](#) from the kidSAFE Seal Program. You may also contact us, through the communication alternatives detailed herein (just scroll to the bottom of this Privacy Policy).

## Parent PIKAPIKA Account

In order to use certain features of the KID Mode App, you as parent will be requested to create a designated Parent PIKAPIKA Account (“Account”).

By creating an account, you provide your consent to the collection, use and disclosure of your child’s Personal Information as described in this Privacy Policy, and as needed per Product. If at any time you do not want you or your child to be bound by these terms, you must deactivate your Account by emailing your request to [care@pikapikaapp.com](mailto:care@pikapikaapp.com) or uninstalling the App from your mobile device. You represent and warrant that you are solely responsible for maintaining the confidentiality of your Account details and password, and for any and all activity made under the Account. You represent and warrant that you will not provide inaccurate, misleading or false information to PIKAPIKA and that you will provide only your own or your child’s information. Following the creation of your Account, you will be able to access your designated dashboard, activate parental controls to your preference and view certain child usage information (the features will require payment).

During Registration, and subject to applicable legal requirements, the parent will be requested to provide consent to the processing of the child's Personal Information related to the child's use of the App (as detailed herein). Following which, an email will be sent to the email address provided through registration. The parent will be required to follow the instructions detailed in the verification email and activate the Account within the period defined therein ("Pending Period"). In the event the parent does not activate the Account within the Pending Period, the Account will be blocked until the parent either requests to resend the verification email and subsequently activates the account, or chooses to proceed solely as a guest (meaning, some features will not be available). In this latter case, the parent account and all child profiles under the parent account will be removed from the PIKAPIKA database and all user activity information previously collected will be deleted and no additional data will be collected for that user.

In either event, following the Pending Period, PIKAPIKA will cease to collect any information related to the specific user's use of the App. In addition, in the event the parent does not activate the Account within the given time period even after having requested a new verification email, in other words, there is no user activity at all for this account, PIKAPIKA will delete the Personal Information related to the child's use of the App. The Account will remain Active until Parent requests to close Account.

## Types of Information We Collect

We may collect different categories of information from you, either Personal or Non-Personal Information (as defined below) depending on the nature of your interaction with the Services, all as detailed below.

The *first type* of information is non-identifiable information that may be made available or gathered through your use of the Services; to clarify, we are not aware of your identity based on such information (“Non-Personal Information”). The Non-Personal Information that is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information such as: device brand, screen size, UDID, type of operating system, type of device, language preference, the time and date you access our Services, your actions within our Services (e.g., registration, pages viewed, etc.), the URLs from which you were directed to our Services, search queries within our Services, etc., and approximate geo-location (Country).

The *second type* of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“Personal Information”). Personal Information includes information voluntarily provided by you as well as certain identifiers, such as Internet Protocol (“IP”) addresses, or mobile advertising identifiers – Google Advertising ID and Apple IDFA (“Identifiers”). Note that the Identifiers are considered “Personal Information” in many jurisdictions (such as the EEA, as well as under COPPA), thus PIKAPIKA treats Identifiers as such and complies with applicable laws. With regards to our

use of Identifiers and your ability to opt-out of such data collection, please see the table below (under Identifiers), as well the “mobile opt out” provision below.

You are not required by law to provide us with certain Personal Information. You can always refuse to provide certain Personal Information; however, you acknowledge that such refusal may prevent you from engaging in certain activities on the Website or Services.

In the event we combine Personal Information with Non-Personal Information, the combined information will be treated as *Personal Information* for as long as it remains combined.

The table below details the information we collect, why we collect it and how we use it:

Type of Information	How Do We Use It?
To use KID Mode App and related services, you as a parent will be required to create an Account. During the registration flow, you will be requested to provide us with a valid email address as well as choose your Account’s designated parent password.	We will use this information for the purpose of performing our contract with the parent, provide the requested Services, and designate the Account through which you will be able to access the dashboard and use the tools provided therein. We will also use the email address in order to send the parent needed information related to our Services and additional occasional promotional communications related to the Services, as well as verify your identity.
To create the child(ren)’s “KID Profile” you as a parent will be requested to provide your child’s first name and grade.	We will use such information to personalize the child’s experience, including providing direct access to third-party apps and content that we

	<p>find to be appropriate and relevant for the child, based on age and language.</p>
<p>If you contact us for support or other inquiries through any means of communication available in our Services you will be required to provide us with a valid email address and may provide us with your name.</p>	<p>We will use this information solely for the purpose of responding to your inquiries directly on a one-time basis and providing you with the support you have requested.</p>
<p>If you voluntarily subscribe to our newsletter you will be asked to provide us with a valid email address. You can unsubscribe at any time using the unsubscribe option within the body of the newsletter or by contacting customer support at <a href="mailto:care@pikapikaapp.com">care@pikapikaapp.com</a>.</p>	<p>We will use the email address in order to send the information related to our Services and to keep you up to date regarding new Products, related news, updates, etc.</p>
<p>Identifiers</p>	<p>We will use the Identifiers we collect for two purposes: (i) We provide kids with age-relevant and school grade relevant content and only for this purpose we ask the grade of your child and (ii) maintaining or internally analyzing the functioning of our Services.</p> <p>In any event, we use the Identifier solely for internal support purposes and/or in compliance with COPPA regulations.</p>
<p>Approximate GEO location data</p>	<p>We will use this information solely to determine the user's country to provide applicable content</p>

<p>Prior to the KID Mode App installation process, you will be requested to provide permission to access the list of applications installed on your device.</p>	<p>We will use this information solely for the purpose of recommending your content you do not have already as well as to create a safer environment for your child and display only child-appropriate apps and content.</p>
<p>Payment Details – the use of features of our Service will require payment.</p>	<p>We do not collect your payment details. We employ third-party payment processors and thus, your payment details will be subject to such third-party payment processors' privacy practices. Currently, we use google pay.</p>
<p>We also collect certain technical Non-Personal Information (as detailed below) that relates to your use of the Services, the amount of time you spent viewing certain portions of the Services, etc.</p>	<p>We use this technical Non-Personal Information for the purpose of: (i) our legitimate interests of operating, providing, maintaining, protecting, managing, customizing and improving our Apps and Services and the way in which we offer them; (ii) providing you with your child's content usage information through the dashboard; (iii) enhancing the experience with the Services; (iv) our legitimate interests of auditing and tracking usage statistics and traffic flow, and detecting fraud, security or technical issues in connection with the Services; (v) perform research, for analytical and statistical purposes, to improve our Services.</p>

Should we need to collect additional Personal Information other than the Personal Information detailed above, we will send a parent an applicable request and obtain consent prior to collection if required under applicable law.

We may use data in an aggregated, non-specific format for analytical purposes. This information is anonymous and will not be linked to any Personal Information. We may share such statistical information with our partners, without restriction.

## How We Collect Information

Depending on the nature of your interaction with the Services, PIKAPIKA may collect information as follows: (i) Automatically – PIKAPIKA collects information automatically transmitted from the device; (ii) Provided by you voluntarily – meaning, if and when you choose to provide us with information such as through a registration process, newsletter registration, contact us communications, etc.

## Disclosure of Information

We do not disclose, share, sell, rent or otherwise distribute any of your or your child's Personal Information with or to any independent third parties unless as specified herein:

- Authorized Disclosures – we may disclose Personal Information to third parties when you consent to a particular disclosure. Please note that once we share your information with another third party, that information becomes subject to the other third party's privacy practices.
- Business Transfers – We may transfer our databases containing Personal Information if we sell our business or any part of it. In that event, our affiliated companies or acquiring company will assume the rights and obligations as described in this Privacy Policy.
- Law Enforcement related disclosure – we may be required to share information (including Personal Information) collected if the

information is required by law to prevent, investigate, or take action regarding illegal activities, situations involving potential threats to physical safety, rights, property or of any person, suspected fraud and violations of our terms and agreements and in response to legal process, court orders, subpoenas, or to establish or exercise our legal rights.

- Business Partners, Service Providers, Affiliates, and Subcontractors – we may disclose information (including Personal Information) to our trusted affiliates, personnel, licensors, contractors, service providers, subcontractors and business partners who may use such information to help us provide you with the Services. For example, we will share the email addresses of users who have registered to our newsletter, in order to provide them with direct marketing services. We authorize these third-party service providers to use Personal Information only for the purpose of providing the specific services.
- Identifiers – we never share Identifiers with any third party

## Data Retention

We retain this collected information as long as it remains necessary for the purposes set forth above, all in accordance with applicable laws, or until individuals express a preference to opt-out or delete their Personal Information. We may, at our sole discretion, delete or amend information from our systems, without notice, once we deem it is no longer needed for such purposes.

## How we Protect Information

PIKAPIKA is committed to protecting your and your child's Personal Information. Thus, PIKAPIKA has implemented technical, physical and

administrative security measures to protect the Personal Information submitted to and collected by us, both during transmission and once we receive it. In addition, PIKAPIKA limits access to the information on its servers, and it is password-protected as well as encrypted. The data collected by us is stored in the AWS data servers; for more information regarding the data security provided by AWS, please see: <https://aws.amazon.com/security/>. You should be aware, however, that there is no data that is transmitted over the Internet that can be guaranteed 100% secure in transmission or safe from theft or illegal capture.

## Your Rights, Choices, and Control of Your Personal Information:

### ***Your Rights***

Our users have a right to know what information we hold about them and their child and, in some cases, to have such information communicated to them. Our users may also ask for our confirmation as to whether or not we process their or their child's Personal Information. Subject to the limitations in applicable law, users may also be entitled to obtain from us the Personal Information they have provided to us in a structured, commonly-used, and machine-readable format, and may have the right to transmit such Personal Information to another party. The principal rights under applicable data protection laws in relation to Personal Information are as follows:

- the right to access any information which is provided by the user;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to object to processing;

- the right to data portability;
- the right to complain to a supervisory authority; and
- the right to withdraw consent (to the extent applicable).

We provide our users with the ability to exercise certain choices and controls in connection with our treatment of their Personal Information, depending on their relationship with us. If you wish to exercise any or all of the above rights, please contact us by email at: [care@pikapikaapp.com](mailto:care@pikapikaapp.com), and let us know that you wish to exercise your right of access and specify what Personal Information you would like to receive or delete (including if you wish to delete the Account). Where we are not able to provide you with the information you have requested, we will endeavor to explain the reasoning for this. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any such information in accordance with applicable law. In addition, the process of locating and deleting the data may take up to one (1) month in accordance with applicable law. Data privacy and related laws in your jurisdiction may provide you with different or additional rights related to the data we collect from you, which may also apply.

#### *Unsubscribe from Direct Marketing*

You may revoke permission to receive promotional messages at any time by contacting customer support at [care@pikapikaapp.com](mailto:care@pikapikaapp.com) or by following the unsubscribe link located at the bottom of each communication. Please note that even if you unsubscribe, we reserve the right to send you

service-related communications, announcements and administrative messages.

### *Opt – Out*

You may easily opt out of certain automatic data collection, related to our Service. Please note that even if you opt-out, you will still receive content and advertising. Opting-out simply means that the advertisements you do receive may not be contextual.

### **Website Opt-out:**

You may control how your browser responds to cookies by adjusting the privacy and security settings of your web browser.

Please refer to the support page of the browser you are using. In this regard, following are some links that you may find useful:

- Google Chrome:  
<https://support.google.com/chrome/answer/95647?hl=en>;
- Firefox:  
<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>;
- Internet Explorer:  
<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>;
- Safari: <https://support.apple.com/kb/PH21411>;
- Edge:  
<https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy>;
- Opera: <http://www.opera.com/help/tutorials/security/cookies/> ;

### **Industry Standards**

You may opt-out of certain advertisers' cookies and browser-enabled, interest-based advertising at the Network Advertising Initiative's ("NAI") website – [NAI consumer opt-out](#) and the Digital Advertising Alliance's ("DAA") website – [DAA opt-out page](#).

Note that once you opt out, part of the Services provided by us might no longer be available and some features may not work if you revoke the data transfer.

If you have any additional complaints about your privacy rights, please contact our Data Protection Officer. Please note that you have the right at any time to contact your local data protection authority.

### Third-Party Sites and Services

This Privacy Policy applies solely to the information collected by PIKAPIKA through the Services and does not apply to any other websites, applications or services. Portions of the Services (including, without limitation, advertisements) may involve linking to or using Third-Party Services such as various icons, shortcuts, applications or other means of access. Though we make best efforts to review such Services and ensure their suitability for children, we have no control over Third-Party Services and all use of such services is at your own risk. We cannot accept responsibility for the privacy practices of any such Third-Party Services and we are not responsible for content made available by them. PIKAPIKA does not endorse any Third-Party Services and we urge you to exercise caution in using them and to review their privacy practices.

## Changes to This Privacy Policy

This policy may change from time to time and we will post the amended terms and notify you by email in the event of substantial changes.

Amended terms will take effect immediately for new users, and 10 days after they are posted for existing users. You should review the Privacy Policy periodically to remain informed of any changes. You agree to accept posting of a revised Privacy Policy as actual notice to you. Your continued use of the Services following any changes to this Privacy Policy have been posted as of the “Last Updated” date above (or, if applicable, notified) signifies your acceptance of those changes. If you do not agree to the revised Privacy Policy, please refrain from using our Services and contact us by sending an email to: [care@pikapikaapp.com](mailto:care@pikapikaapp.com).

## Comments and Questions

If you have any comments or questions about our Privacy Policy, please contact us at:

FLoydwiz Technologies Pvt Ltd

262, Westend Marg

Saket, New Delhi, India

PIN 110030

You can also contact us via email at: [care@pikapikaapp.com](mailto:care@pikapikaapp.com).

## Data Protection Officer

If you have any requests regarding the data collected under this Privacy Policy, including without limitation, requests to remove, delete, amend,

modify or transfer the data, please contact our Data Protection Officer at:  
[amangupta@primeos.in](mailto:amangupta@primeos.in).

Please be sure to include your information in any correspondence to us so that we can respond to your inquiry in a timely manner.