

PRIVACY POLICY

Effective date November 2018

Please read this Privacy Policy carefully to understand our policies and practices regarding your Personal Data (as defined below) and how we will treat it.

This Privacy Policy applies to MKCM Software's apps, software and website which will be termed "Services" in the remainder of this document. This Privacy Policy explains how we collect, use, secure, and/or disclose end users' or otherwise processes your personal information when you use our Services.

The data controller is MKCM Software, LLC, contact MKCMSoftware@gmail.com

INFORMATION WE COLLECT AND HOW

While using our Services, we may ask you to provide us with certain personally identifiable information that can be used to identify you ("Personal Data"). Our Services are designed to avoid collecting information such as your name, address, email address or other similar contact data unless you provide such data to us. The information we collect include:

Device Information

When you download and use our Services, we automatically collect information on the type of device you use, operating system, resolution, application version, and the mobile device identifiers (such as your device ID, advertising ID), language and time zone and IP address.

Usage Information

We collect information automatically about your activity through our Services, for example date and time you used a service, features you have used, in-app purchases history, subscriptions, and advertising that you click on, and data generated when you use our Services, for example your game progress which may be stored with your Apple ID on iCloud for iOS Devices or with your Google Play Games profile for Android Devices in some of our Services.

Other information

We may collect upon your permission other information such as precise geolocation (latitude and longitude) using information including GPS, Bluetooth or Wi-Fi connections. If you decline permission for us to collect your geolocation, we will not collect it. Similarly, we may ask for access to your camera in case you want to use certain features of our Services.

Information obtained from third parties

We may receive information about you from our analytic service providers with data they collect through our Services in accordance with their own privacy policies. A list of the third parties that operate in our Services can be found in the APPENDIX B below.

Customer enquiries

We collect some information from you when you provide it to us directly when you send us an email directly.

Cookies and similar data collection technologies

We and our advertising networks and their partners may use cookies and similar technologies, such as Mobile SDK, to provide and personalize our Services and to provide targeted advertisements. Some of these technologies can synchronize behavior across different mobile apps, devices, and websites so that advertisements can be tailored to your interests. This process is called personalized advertisement experience. If you would like to opt-out from having advertisements personalized in this way on your mobile device, please see below “Opt-out of targeted advertising”.

More information on how third parties may use cookies in our Services go to Appendix A and Appendix B further below.

PURPOSES FOR WHICH WE WILL USE YOUR INFORMATION

We have set out below a description of the ways in which we use your information, the legal bases we rely upon to do so and provide opt-out, where applicable:

To provide and maintain our Services, recognize you when you return to our apps, and to perform essential business operation, our legal basis for processing is performance of a contract with you which you entered into with us when you download our Services.

To administer and protect our Services (including troubleshooting, data analysis, testing, support, fraud, reporting and hosting of data), our legal basis for processing is legitimate interests for running our business, provision of administration and services.

To communicate with you about any support and to understand how you use our Services so that we can continuously improve our offerings, our legal basis is performance of a contract, legitimate interests or consent depending on the particular case to keep our users updated

about our Services and our new features in accordance with your preference, and to continue to improve the Services we offer.

To serve personalized advertisements in our Services using third-party advertising networks, our legal basis is legitimate interests to run our business. However, if you are in the European Economic Area, Norway or Switzerland, some of our third-party advertising networks, will rely on your consent to process Personal Data in order to provide personalized advertising to you, therefore you will be asked whether you consent to the collection of your mobile device advertising identifier and IP address so that they can provide a personalized advertisement experience.

To opt-out or withdraw your consent of receiving personalized advertisements, see below “Opt-out of targeted advertising”.

RETENTION OF DATA

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Information for internal analysis purposes. Usage Information is generally retained for a shorter period of time, except when this data is used to improve the functionality of our Services, or we are legally obligated to retain this data for longer time periods.

Your Personal Data collected through our apps will be deleted when they no longer serve one of the above-mentioned purposes but in any event your Personal Data will be deleted after 12 months of inactivity in your use of our Services.

Once we have deleted your Personal Data, you will not be able to exercise the right to access, the right to erasure, the right to rectification or the right to data portability.

YOUR RIGHTS AND OPTIONS

Access personal data we hold about you.

You have the right to request access to your Personal Data collected through our apps. Following your request, we will provide you a copy of your Personal Data in an electronic format.

For Personal Data you send us through email, simply send us your data access request to the email listed below.

Other rights.

You also have other rights such as to correct your data, have your data deleted, object how we use or share your data, and restrict how we use or share your data. You also have the right to withdraw consent where you have previously given your consent to the processing of your personal data, for example by turning off camera access in your mobile device settings. This will not affect any data processed before such a withdrawal.

Opt-out of targeted advertising.

To show you personalized advertisements in our apps we use third-party advertising networks and their partners, including those that need your consent and listed in "APPENDIX A - Advertising networks and their partners" below, to deliver advertisements that are tailored to you based on a determination of your characteristics or interests. To do so they use personal and non-personal information such as advertising identifiers, such as the Android advertising ID and/or Apple's ID for advertising (IDFA), and/or other tracking technologies to enable and optimize this advertising procedure.

You can opt-out from personalized advertisement experience, at any time by checking the privacy settings of your Android or iOS device.

For Apple Devices:

Open Settings
Select Privacy
Select Advertising and enable "Limit Ad Tracking"

For Android Devices:

Open Settings
Select Google
Select Ads and enable "Opt out of Ads Personalization"

When you choose to opt-out, advertising networks will consider this choice as a withdrawal of consent to personalized advertisement experience and they will show contextual advertisements and not personalized advertisements based on your interests.

Exercise these rights.

Any requests to exercise your rights should be made through our email at MKCMSoftware@gmail.com. These requests can be exercised free of charge and will be

addressed by us as early as possible. You may also contact your local data protection authority within the European Economic Area for unresolved complaints.

STORAGE, DISCLOSURE, TRANSFER AND SHARING OF YOUR INFORMATION

Storage

Information of our users are stored in our data center in the US

Share with our service providers and partners

We use third parties to help us operate and improve our Services. These third parties assist us with various tasks, including hosting and maintenance, on-going development, analytics, customer care, marketing, advertising. We may also share information with advertising partners who distribute advertising in our Services.

For further information on advertising networks go to “APPENDIX A - Advertising networks and their partners” below and for further information on analytics service providers go to “APPENDIX B - Analytics and Other service providers” below.

For corporate transactions

We may transfer your information if we are involved, whether in whole or in part, in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control.

When required by law

We may also share information if we also under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of our business, our customers or others.

To enforce legal rights

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

With your consent or at your request

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

Cross-border data transfers

Sharing of information sometimes involves cross-border data transfers, including transfers outside of the EEA in accordance with the law. We only transfer Personal Data to entities in third countries that have provided appropriate safeguards to ensure that their level of data protection agrees with this privacy policy and applicable law, for example in accordance with the rules and procedures known as the EU-US Privacy Shield, or under contractual provisions which have been deemed by the European Commission to provide sufficient safeguards for personal data.

LINKS TO OTHER SITES

Our Privacy Policy may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy terms of every site you visit. We have no control over and assume no responsibility for the content, privacy terms or practices of any third-party sites or services.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy may change from time to time, and we encourage you to review it periodically. Your continued use of our Services signifies your acceptance of changes to this Privacy Policy.

CONTACT US

If you have any questions about this Privacy Policy contact our data protection officer at the email address provided below:

MKCMSoftware@gmail.com

APPENDIX A - Advertising networks and their partners

Below, you can find a list with third-party advertising networks and their partners, with whom we work to provide you with a personalized advertisement experience within our apps. The advertising networks listed below are independent data controllers in respect of your personal data and you can learn more about how each handles your data by accessing their respective privacy notices using the hyperlinks below.

In order to provide personalized advertisements to our users, those listed below use device information that include personal and non-personal information, such as advertising (or ad) identifiers, IP address regarding the delivery of advertisements and your interaction with them and/or other tracking technologies to enable and optimize this advertising procedure. Ad identifiers are non-permanent device identifiers such as the Android advertising ID and/or Apple's ID for advertising (IDFA).

AdMob by Google and their partners

AdMob by Google is provided by Google Inc. (US)

For more information on how AdMob uses the collected information, please visit the Privacy Policy of Google: <http://www.google.com/policies/privacy/>

For more information on AdMob Partners, please visit:

<https://support.google.com/admob/answer/9012903>

You can opt-out from AdMob by Google service by following the instructions described by Google: <https://support.google.com/ads/answer/2662922?hl=en>

APPENDIX B - Analytics and Other service providers

We use your information to perform our own analytics and to enable analytics provided by third parties and other essential functions. We use analytical information for supporting business analysis and operations, business intelligence, product development, improving the Services, personalizing content, providing advertising, and making recommendations. In order to learn about how your information is used by our analytics service providers, you can follow the hyperlinks in the list below to each provider's privacy notice.

Firebase - Firebase is analytics service provided by Google Inc. (US)

You may opt-out of certain Firebase features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <http://www.google.com/intl/en/policies/privacy/>