

Skipity Inc Privacy Policy

Last Updated: June 13, 2020

Skipity is committed to making software that is fun and safe to use. We are committed to international best practices regarding the collection and minimal use of both anonymous and personally identifiable information (PII), in ways that are fully compliant with international standards such as GDPR, COPPA, and the California Consumer Privacy Act.

In general, our approach is to only collect anonymous data wherever possible and use as little personal identifying information (PII) as is necessary to provide the best user experience.

We do not gather or use anonymous data or any personal information to broker to third parties for commercial purposes; we only want to make our apps better, and we only work with best in class advertising companies with similar policies. We ask users whether they are under 16 if in the European Union and under 13 in all other territories, and if users are under those respective ages, we do not collect or store on our servers any PII, including IP address. Still wanting to make sure we provide best-in-class customer service, those users are given a non-personal unique code if they need to contact customer support.

This privacy policy applies to the Skipity website located at <http://skipity.com> and all products we produce including: Facebook apps, Xbox, Playstation, and Steam apps, and to our mobile apps published on Google Play Store, Apple App Store, Amazon App Store, and other popular app stores.

This privacy policy may change to reflect changes in business practice, legislation, or market reality, such as the California Consumer Privacy Act. Any changes will be posted here, and significant changes will either be broadcast on the social channel <https://www.facebook.com/skipity/>.

We continue to monitor the high standards set by the state of California and by the EU, and we endeavor to update our policies to remain reflective of those highest standards. Our goal is to be compliant with privacy laws and the dictates of corporations like Apple, who (for example) require that we Confirm that any third party with whom an app shares user data (in compliance with these Guidelines) — such as analytics tools, advertising networks and third-party SDKs, as well as any parent, subsidiary or other related entities that will have access to user data — will provide the same or equal protection of user data as stated in the app's privacy policy and required by these Guidelines. So we do.

Data retention/deletion policies

Skipity will to the best of it's ability retain the data and metadata that it collects. A user may revoke consent to use data or request deletion of data by emailing privacy@skipity.com

Types of and Use of Information

Skipity is committed to only using information when there is legitimate interest and where that interest supports player-focused services, such as registration, communication, customer support, and relevant advertising.

Skipity Mobile Registration:

When you register for a Skipity mobile account, this account can be used across most Skipity mobile apps but does not provide registration to skipity.com or forums. You may provide us with an email that we use as a unique identifier for your account or choose a 3rd party login like Facebook, Google, or Gamecenter. We do not collect any age, gender, country, or other information. The primary use of this email is to allow customers to contact support@skipity.com from that email, so that customer support can immediately validate ownership and offer assistance more quickly. We do not do email marketing to mobile users. We do need to reserve the right to email all registered users in the case of legal notices or major company news, but we have never needed to do this to date. **users under the age of 16 in the European Union or under the age of 13 in all other territories are allowed to register for Skipity accounts, but they cannot supply any personally identifiable information and are instead generated a non-personal unique code that they can reference for customer support.** For apps with social teams such as Clans or Guilds, users under 16 in the EU or under 13 elsewhere must identify themselves as such before they join a Clan or Guild in these apps, and these younger users are then excluded from sending, receiving, or reading any chat messages - chat is completely disabled. Instead of simply excluding under age users from the game or from participating in Clans and Guilds, we choose this approach as it allows under age users to participate in the fun of Clan and Guild play and be part of a team, but without risking PII sharing. users 16 and over in the EU and 13 and over elsewhere consent that any information they enter into chat, along with any and all other data, may be stored on servers in the United States or other countries.

Facebook, Google+, Game Center, and Game Circle Logins:

We use these services to simplify logins to our mobile and website logins and to connect users to their friends for co-operative and competitive play, and to compare scores and progress. We use the respective platform standard versions of these services and only reference the username/email associated to associate with your saved data, scores, and game progress.

Facebook and Google+ Information:

When you register for Skipity using Facebook or Google+, use Facebook likes or Google "+", or share links through these services, Skipity accesses data already provided to Facebook and Google in accordance with their Privacy Policies, and is only granted access to that information via the player-approved permissions necessary to use those apps or services. Skipity from time to time may review Facebook and Google+ data such as aggregate (not individual) age, country, and gender along with various data about how the overall player community are playing a game or using the web site in order to make our apps and services more awesome. This information may be stored in cookies or on our secured servers but is not accessed by Skipity in this way; if reviewed, such information is only viewed in aggregate via developer dashboards made available by these 3rd parties and covered by their privacy and security standards. Skipity does not share or sell this information with any party.

Mobile App Data:

Skipity tracks gameplay information about the way users play our mobile apps or use our apps, which includes game and player progress information that is essential for saving and protecting that progress. Analytics track elements of the game the users interact with most and least frequently, where users stop playing or play less, and other aspects of aggregate player progression through the game. Skipity does not use analytics to try to squeeze more money out of users; we like to think we are in the old fashioned business of making fun apps, so we use these analytics to help us understand what elements users are enjoying and when the fun stops so we can try to improve all users' enjoyment. For users age 16 or older in the EU and age 13 or older in all other territories, IP address, device type, OS type, time stamp, and other general device level information are accessed and stored on distributed, scalable servers, which may be located in the United States. For users under age 16 in the EU and under age 13 in all other territories, no PII is stored.

Web Game and Site Data:

Skipity tracks information about the way visitors and users use our web sites and apps so that we can make our sites and apps more accessible, pertinent, and fun. Ninjakiwi.com uses log files to store information such as internet protocol (IP) addresses, browser type, internet service provider (ISP), referring, exit and visited pages, platform used, date/time stamp, track player game usage on the whole, and gather very general machine-supplied information for aggregate use (location and language). IP addresses and language settings are not linked to personally identifiable information. Skipity uses cookies, server stored game data, and third-party analytics services to track player activity and make apps more awesome. This information is stored on distributed, scalable servers, which may be located in the United States. You can set your browser to limit or reject cookies, but this has a high chance of interfering with website and web game features and may prevent some web apps from playing at all or saving your progress. If you want to play our web apps, please understand that cookies are small save files for your player progress, so they need to stay available.

Advertising:

Skipity uses third-party advertising companies to serve ads when visiting our web pages and mobile apps. We offer our web apps and many of our mobile apps for free, so these ads allow us to continue making and updating top quality free apps. The third-party advertising companies may collect and use information (but not your name, address, email address, telephone number, or other PII) about your visits to skipity.com and our mobile apps in order to provide advertisements about goods and services of interest to you. For Bloons Adventure Time TD, Turner Broadcasting may collect non-personally identifiable information to manage and measure the delivery of advertising within that game, including the number of times the same advertisement is served and viewed. For users registered as under age 16 in the EU or under age 13 elsewhere, we use designated non-PII ad calls that either do not send PII (usually IP address) or encrypt that PII so that we have no access to it. These companies may use non-personally identifiable information (e.g., click stream information, browser type, time and date, heat maps, player behavior) during your visits to skipity.com and Skipity mobile apps in order to provide advertisements about goods and services likely to be of greater interest to you. These companies typically use a cookie or third party beacon to collect this information. We do not have access to this information or influence over third party ad network policies, barring our ability to discontinue their services. If you would like more information about advertising practices and to know your choices about not having this information used by these companies, you can visit [Google's Advertising and Privacy](#) page or the [Network Advertising Initiative](#). Please understand that if you disable or block certain ad features, then other aspects of skipity.com, its apps, or mobile apps may not work correctly.

Billing and Financial:

Skipity does track the act of purchasing (that a purchase happened and what was purchased) when using Facebook Credits, Super Rewards, Xsolla, Trial Pay, iTunes, Google Wallet, Amazon, and/or other 3rd party wallet services, but

Skipity does not have access to any personal billing information

The act of purchasing is tracked for purposes of making sure that Skipity apps deliver great value for money and so that we can provide awesome customer support should something go wrong, and in such cases assist in the processing of refunds where possible.

Other Use of Information

Skipity does not sell, rent, or publicly share your PII or aggregate data to anyone. We may use the information you provide to provide customer support or respond to forum posts. In the event of a change in corporate ownership or control, we would transfer all personally-identifiable and non-personally identifiable information to the new owner or controlling party. Skipity would also

share the minimum PII necessary to comply with court order, fraud protection, or other legal proceedings, to enforce our Terms of Service, or to protect the safety, rights, or property of Skipity or its employees.

Children Under 16 in the EU and Under 13 In All Other Territories

We respect the privacy of parents, guardians, and their children, and we are committed to complying with the Children's Online Privacy Protection Act (COPPA), the California Consumer Privacy Act (CCPA) and EU standards, including the Global Data Protection Regulation (GDPR). On skipity.com, users under age 16 in the EU or under age 13 in all other territories may not enter PII during the registration process (they must use a parent's or guardian's email address) and they may not sign up for forum accounts at all. Mobile users under age 16 in the EU or under age 13 in all other territories, do not share any personal information in the registration process and no PII such as IP address is stored for those users. Bloons TD Battles and Tower Keepers allow children under 16 in the EU and under 13 elsewhere to participate in guilds but not to send, receive, or view any chat messages. The skipity.com and Kongregate versions of Bloons TD Battles, Bloons TD 5, and SAS Zombie Assault 4 allow text chat to coordinate and enhance the multiplayer experiences; children under 16 may not use these chat systems. If anyone ever asks for personal information in chat, please screenshot the interaction and send the image to privacy@skipity.com for investigation. Helpful "mute" buttons also exist in each of those apps that will hide chat entirely, and we encourage parents and guardians to use this setting for those under 13.

If at any time a parent or guardian believes that his or her child has submitted personal information to Skipity, he or she can contact us at privacy@skipity.com. Skipity will make reasonable efforts to delete the information upon learning that it relates to a child under the age of 16. Skipity believes that parents should supervise their children's online activities and actively advise them on appropriate behavior and online safety, including avoiding chat systems and other open communication tools and never sharing personal information.

In-App Purchasing

Many of our apps provide additional content for a direct fee - usually buying an item or an amount of in-game currency to make gameplay faster or more fun. Parents and guardians should be aware that they can set up their mobile devices to disallow one touch purchases and enforce password entry before any real-money purchase. Parents and guardians are responsible for maintaining password security for these systems and in general should not share passwords with their children. The following links describe how to make sure purchase verification is in place:

Security

Skipity's apps and websites may contain advertisements or other links to other websites or apps as a service to you. These third party sites and apps are outside of our control and your

activities with them are subject to their terms and privacy practices. We encourage you to review their terms and privacy practices before sharing any personal information with them, but we are not responsible for their privacy practices or for your disclosure of information to them.

Nevertheless, we only want to be working with partners who exercise best practices, so if you ever have concerns about third parties, the services they provide, or the ads they serve, you may contact us at privacy@skipity.com so that we can review our relationship with them. Skipity takes appropriate and reasonable precautions to protect the information you provide, both during delivery and in its stored location. These precautions include but are not limited to the encryption of network and player cloud data, separate project save storage, distributed storage with no sensitive data stored at Skipity's offices, and breach detection and countermeasures. On the player's side of the equation, we urge you to keep your login and password information private, to log out from any computer or mobile device that could be accessed by someone else, and to refrain from leaving written passwords near your computer or device. If you believe your account has been compromised, please reset your account password immediately, or contact us at privacy@skipity.com so that we may assist you.

California and European Union Additional Privacy Rights (CCPA and GDPR)

Residents of California have rights granted by the California Consumer Privacy Act to request access to the information we have collected about them and/or to delete that information.

Residents of the European Union have rights granted by the General Data Protection Regulation to request access to the information we have collected about them and/or to delete that information. If you are a California or EU resident, you (or your parent or guardian) may request access to information collected about you and/or to delete that information by contacting us at privacy@skipity.com.

Additional Options and Questions

If you do not agree with this privacy policy, you should immediately cease use of skipity.com, Skipity web apps, Skipity forums, and Skipity mobile apps. You should delete cookies related to skipity.com or other websites where Skipity web apps were played, uninstall any Skipity apps from Steam, Xbox, or PS4, and delete the mobile apps from your device(s). Feel free to contact us about any questions regarding Skipity or our policies at privacy@skipity.com.