

## **PRIVACY POLICY – KID KULTURE SOCIAL APP**

**Last Updated: March 8, 2024**

This Privacy Policy ("Policy") for **KID KULTURE SOCIAL CORPORATION** ("we," "us," or "our"), describes how and why we might collect, store, use, and/or share ("process") your information when you use our services ("Services"), such as when you:

- Download and use our mobile application ("Kid Kulture Social App" "the App")

Reading this Policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at 646-651-2202 or email at [KIDKULTURAPP@gmail.com](mailto:KIDKULTURAPP@gmail.com)

### **SUMMARY OF KEY POINTS**

This summary provides key points from our Policy, but you can find out more details about any of these topics by clicking the link following each key point or by using our table of contents below to find the section you are looking for.

- a. What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.
- b. Do we process any sensitive personal information? We may process sensitive personal information when necessary with your consent or as otherwise permitted by applicable law.
- c. Do we receive any information from third parties? We do not receive any information from third parties.
- d. How do we process your information? We process your information to provide, improve, and administer the App, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.
- e. How do we keep your information safe? We have organizational and technical processes and procedures in place to protect your personal information. However, no electronic transmission over the internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information.
- f. What are your rights? The privacy laws in the United States guarantee you certain rights regarding your personal information.
- g. How do you exercise your rights? The easiest way to exercise your rights is by submitting a data subject access request, or by contacting us. We will consider and act upon any request in accordance with applicable data protection laws.

Want to learn more about what we do with any information we collect? Review the privacy policy in full.

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### **1. WHAT INFORMATION DO WE COLLECT?**

- a. Personal information you disclose to us: We collect personal information that you voluntarily provide to us when you register on the App or otherwise express an interest in obtaining information about us or our services. The personal information that we collect depends on the context of your interactions with us and the App, the choices you make, and the features you use. The personal information we collect may include the following your full names, date of birth and email addresses. This processing will be carried out in accordance with applicable privacy laws and regulations to ensure the confidentiality and security of your personal data. We are committed to maintaining the privacy and protection of your information, and any processing will be conducted in compliance with our Privacy Policy and relevant legal requirements.
- b. Sensitive Information. When necessary, with your consent or as otherwise permitted by applicable law, we may collect certain children data from you.
- c. Application Data. If you use the App, we also may collect the following information if you choose to provide us with access or permission:
  - Geolocation Information. We may request access or permission to track location-based information from your mobile device, either continuously or while you are using the App, to provide certain location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
  - Mobile Device Data. We may automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information

- and system configuration information, device and application identification numbers, browser type and version, hardware model Internet service provider and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our applications), we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of mobile device you use, your mobile device's unique device ID, and information about the features of our application(s) you accessed.
- Push Notifications. We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

This information is primarily needed to maintain the security and operation of the App, for troubleshooting, and for our internal analytics and reporting purposes. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

- d. Information automatically collected: We automatically collect certain information when you visit, use, or navigate the App. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the App, and other technical information. This information is primarily needed to maintain the security and operation the App, and for our internal analytics and reporting purposes. The information we collect includes:
- Log and Usage Data. Log and usage data is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use the App and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings and information about your activity in the App (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).
  - Device Data. We collect device data such as information about your mobile phone, tablet, or other device you use to access the App. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model, Internet service provider and/or mobile carrier, operating system, and system configuration information.
  - Location Data. We collect location data such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the App. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing

us to collect this information either by refusing access to the information or by disabling your Location setting on your device. However, if you choose to opt out, you may not be able to use certain aspects of the App.

## **2. HOW DO WE PROCESS YOUR INFORMATION?**

We process your personal information for a variety of reasons, depending on how you interact with the App, including:

- a. To facilitate account creation and authentication and otherwise manage user accounts. We may process your information so you can create and log in to your account, as well as keep your account in working order.
- b. To deliver and facilitate delivery of services to the user. We may process your information to provide you with the requested services.
- c. To respond to user inquiries/offer support to users. We may process your information to respond to your inquiries and solve any potential issues you might have in connection with the App.
- d. To send administrative information to you. We may process your information to send you details about the App and our related products and services, changes to our terms and policies, and other similar information.
- e. To enable user-to-user communications. We may process your information if you choose to use any of our offerings that allow for communication with another user.
- f. To request feedback. We may process your information when necessary to request feedback and to contact you about your use of the App.
- g. To protect our Services. We may process your information as part of our efforts to keep the App safe and secure, including fraud monitoring and prevention.
- h. To evaluate and improve the App, products, marketing, and your experience. We may process your information when we believe it is necessary to identify usage trends, and to evaluate and improve our services, products, and your experience.
- i. To comply with our legal obligations. We may process your information to comply with our legal obligations, respond to legal requests, and exercise, establish, or defend our legal rights.
- j. To save or protect an individual's vital interest. We may process your information when necessary to save or protect an individual's vital interest, such as to prevent harm.

In addition to the foregoing, we may use and process your information to comply with our legal obligations, respond to lawful requests or court orders, and enforce our terms and conditions. This includes protecting our rights, safety, and property, as well as the rights, safety, and property of our users or any other third parties. We may aggregate and anonymize your information to create statistical or aggregated data that does not personally identify you. This aggregated and anonymized data may be used for various purposes, such as analyzing usage patterns, improving our Services, or conducting market research, or sharing with third parties for lawful purposes.

### 3. LEGAL BASES FOR PROCESSING YOUR INFORMATION

In compliance with the Children's Online Privacy Protection Act (COPPA), Kid Kulture Social App outlines the legal bases for processing your information. Please note that COPPA applies to Kid Kulture Social App solely in instances where it collects information directly from children under the age of 13 when they interact with the App (such as device identifiers, cookies, IP addresses, and geographic locations where their device is used to process such information). The App adheres to stringent privacy standards, ensuring that the collection and processing of user information are conducted within the framework of applicable data protection laws.

- a. COPPA Compliance: In accordance with COPPA, Kid Kulture Social App specifically addresses the processing of information for users under the age of 13:
  - Verifiable Parental Consent: For users under 13, Kid Kulture Social App obtains verifiable parental consent before collecting, using, or disclosing personal information. This consent is a crucial legal basis for processing information under COPPA. Upon initial setup, all new users encounter a birthdate entry screen, where they are required to input their date of birth. All new users are required to provide an unexpired government issued ID for comparison and verification, consenting parents are required to verify their identity through submission of a photo of an unexpired government issued ID. Kid Kulture Social App may also utilize live photo verification of all users to guarantee the security of the App.

This step serves a critical purpose, as the App automatically calculates the user's age to verify that they are at least 13 years old. This age verification process is essential for complying with online privacy laws that specifically safeguard minors, as outlined by COPPA. While COPPA's parental consent requirements are specifically targeted at children under 13, Kid Kulture Social App extends its commitment to transparency and data privacy to users of all ages. The age verification step underscores our dedication to creating a secure digital space for everyone, promoting responsible online practices, and prioritizing the protection of user information.
  - Necessary for the Operation of the Service: Information processing for users under 13 is limited to what is reasonably necessary for the operation of the App. This includes providing age-appropriate content and ensuring a safe online environment for younger users.
  - Security and Integrity of Data: Processing is also based on the need to maintain the security and integrity of user data, ensuring a protected environment for all users, especially children.
- b. We may process your information where we believe it is necessary for compliance with our legal obligations, such as to cooperate with a law enforcement body or regulatory agency, exercise or defend our legal rights, or disclose your information as evidence in litigation in which we are involved.

- c. We may also process your information where we believe it is necessary to protect your vital interests or the vital interests of a third party such as situations involving potential threats to the safety of any person.

Kid Kulture Social App is committed to upholding the rights and protections afforded by the CCPA and COPPA. Users are encouraged to review the app's Privacy Policy for comprehensive details on the legal bases for processing personal information, including their rights and options in managing their data within the App.

#### **4. HOW DATA WILL BE COLLECTED**

- a. Before we collect your data, all new users must complete the sign up form on the App landing page and opt in by clicking "Agree & Continue" to the Terms & Conditions and Privacy Policy of the App.. By clicking "Agree & Continue", you acknowledge that you have read and agreed to our [Terms & Conditions](#) and [Privacy Policy](#) and consent to the collection, use, and disclosure of your information as set forth in our Privacy Policy.

#### **5. CHILDREN'S PRIVACY**

Kid Kulture Social App prioritizes the safety and privacy of children using the platform. Therefore, we do not knowingly collect or solicit personal information from individuals under the age of 13. If we learn that we have collected personal information from a child under 13 without verification of parental consent, we will take steps to remove that information from our servers as quickly as possible. Furthermore, we encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity. If a parent or guardian believes that Kid Kulture Social App has in its database the personally-identifiable information of a child under 13, please contact us immediately to request the removal of that information from our records. By using our services, you are confirming that you have read and understood the policies regarding children's privacy.

#### **6. ANALYTICS TOOLS FOR OPERATIONAL PURPOSES**

Kid Kulture Social App may employ analytics tools for operational purposes. These tools serve essential functions, including monitoring app performance, analyzing user interactions, and improving overall functionality. The use of analytics tools, specifically for app store analytics, allows Kid Kulture Social App to gather valuable insights into how users interact with the application. This information is instrumental in identifying areas for improvement, enhancing features, and addressing potential issues to provide a more seamless and efficient experience. It's important to note that while analytics tools are utilized, the data collected is aggregated and anonymized to ensure the privacy of individual users. These tools focus on broad trends and patterns rather than personal identifiers.

#### **7. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?**

We may need to share your personal information in the following situations:

- a. **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business to another company.
- b. **Other Users.** When you share personal information (for example, by posting comments, contributions, or other content to the App) or otherwise interact with public areas of the App, such personal information may be viewed by other users and may be publicly made available. Understanding the identity of users you interact with, be it a child or an adult, is fundamental for a trusted and reliable experience. To achieve this, Kid Kulture Social App employs a secure two-factor Google Authentication process. When you engage in interactions on the App, your name and email address, authenticated through Google, are automatically stored in our database. This ensures a seamless and trustworthy communication experience within the App.

## **8. HOW LONG DO WE KEEP YOUR INFORMATION?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this Policy will require us keeping your personal information for longer than twelve (12) months past the termination of the user's account. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **9. HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process. To uphold the safety and privacy of children data within Kid Kulture Social App, we implement robust security measures, particularly in the storage and management of data.

The following highlights key aspects of how Kid Kulture Social App ensures the security of users data:

- a. **Data Encryption:** All data, encompassing emails, names, messages, and other children information, undergoes encryption both in transit and at rest. This means that the data is shielded from unauthorized access during transmission to and from Firebase, as well as while stored in Firebase databases.
- b. **Authentication:** Kid Kulture Social App provides a two-factor authentication as a mandatory additional security measure. it guarantees that only authorized users can access the app securely.

- c. **Regular Updates and Maintenance:** Kid Kulture Social App benefits from the platform's routine security updates, protecting against emerging vulnerabilities and threats. This proactive approach ensures ongoing defense against evolving security challenges.
- d. **Access Controls and Permissions:** Kid Kulture Social App allows for the meticulous configuration of access controls, ensuring that only authorized personnel can access sensitive children and adult data. This feature is pivotal in preventing unauthorized access or potential data breaches.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

It's essential to note that while messages are securely stored, they remain accessible to designated App administrators. This access is granted to authorized personnel to support the effective administration and oversight of communication within the App. App admins may need to review messages for purposes such as ensuring compliance with privacy policies, addressing concerns, or providing assistance to users. The security and confidentiality of your messages are of utmost importance to us. Kid Kulture Social App employs robust security measures, including data encryption and access controls, to safeguard the integrity and privacy of the messages stored in our database. These measures are designed to prevent unauthorized access and protect the sensitive nature of communication within the educational community.

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

- a. You may review, change, or terminate your account at any time.
  - **Withdrawing your consent:** If we are relying on your consent to process your personal information, which may be express and/or implied consent depending on the applicable law, you have the right to withdraw your consent at any time. You can withdraw your consent at any time by contacting us or by opting out in the sign up form.
  - However, please note that this will not affect the lawfulness of the processing before its withdrawal nor, when applicable law allows, will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- b. **Account Information:**
  - If you would at any time like to review or change the information in your account or terminate your account, you may: (i) log in to your account settings and update your user account; or (ii) contact us using the contact information provided.
  - Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information

in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our legal terms and/or comply with applicable legal requirements.

- If you have questions or comments about your privacy rights, you may contact us.
- c. You have the right to request information about the personal data Kid Kulture Social App holds about you. This includes details about the categories of data collected, the purposes of processing, and disclosure to third parties.
- d. You can request the correction of inaccurate or incomplete personal data held by Kid Kulture Social App. Ensuring the accuracy of your information is vital for a seamless user experience.
- e. You have the right to request the deletion of your personal data under certain circumstances. Kid Kulture Social App will comply with such requests, subject to legal obligations and legitimate business interests.
- f. You may request restrictions on the processing of your personal data under specific conditions. This means that while your data is still maintained, its processing is limited until the matter is resolved.
- g. You have the right to object to certain types of processing activities, such as direct marketing. Kid Kulture Social App will respect your choice, unless there are compelling legitimate grounds for continuing the processing.
- h. Upon request, you can receive a copy of your personal data in a structured, commonly used, and machine-readable format. This right applies to personal data provided by you and processed based on consent or for the performance of a contract.
- i. For users covered by the App, you have the right to opt-out of the sale of your personal information. Kid Kulture Social App does not sell personal information, but if this changes, you will be given the option to opt-out.
- j. You have a right to Contact us regarding any concerns or complaints about our handling of your personal information: We take privacy and data protection seriously and will make every effort to address any issues that may arise.

## **11. CONTROLS FOR DO-NOT-TRACK FEATURES**

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## **12. CALIFORNIA RESIDENTS - CCPA PRIVACY NOTICE**

This section applies only to California residents. Under the California Consumer Privacy Act (CCPA), you have the rights listed below.

The California Code of Regulations defines a "residents" as:

- every individual who is in the State of California for other than a temporary or transitory purpose and
- every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

Your rights with respect to your personal data

- a. Right to request deletion of the data - Request to delete: You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation, or any processing that may be required to protect against illegal activities.
- b. Right to be informed - Request to know: Depending on the circumstances, you have a right to know:
  - whether we collect and use your personal information;
  - the categories of personal information that we collect;
  - the purposes for which the collected personal information is used;
  - whether we sell or share personal information to third parties;
  - the categories of personal information that we sold, shared, or disclosed for a business purpose;
  - the categories of third parties to whom the personal information was sold, shared, or disclosed for a business purpose;
  - the business or commercial purpose for collecting, selling, or sharing personal information; and
  - the specific pieces of personal information we collected about you.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

- c. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights: We will not discriminate against you if you exercise your privacy rights.
- d. Right to Limit Use and Disclosure of Sensitive Personal Information: If we collect any sensitive data from you, you have the right to direct that we limit its use of your sensitive personal information to that use which is necessary to provide our Services. We will not process your sensitive personal information for any other purpose unless you provide consent for the use or disclosure of sensitive personal information for additional purposes.

To exercise your right to limit use and disclosure of sensitive personal information, please contact us or submit a data subject access request.

### **13. USER-GENERATED CONTENT:**

If you choose to submit or post user-generated content on the App, such as reviews, comments, or photos, please be aware that this content shall be accessible by the recipients designated by you. The information within the message will only be accessible to those individuals to whom the message has been sent. Once user-generated content is submitted or posted on the App, it is not possible to withdraw or retract the content. We are not responsible for any personal information you include in your user-generated content, so please use caution when sharing personal information within the App.

### **14. THIRD-PARTY LINKS:**

Our App may contain links to other websites or apps that we do not own or operate. These links are not under our control and we are not responsible for the privacy practices or content of such websites or apps. We encourage you to be aware when you leave our App and read the privacy statements of every website or app that collects personal information. This Policy does not apply to any third-party websites or apps.

### **15. CHANGES TO OWNERSHIP OR CONTROL:**

In the event of a change in ownership or control of our Company, such as through a merger or acquisition, your personal information may be transferred to the new owners. We will notify you of any such change and provide choices regarding your personal information.

### **16. UPDATES AND MODIFICATIONS**

We reserve the right to update, modify, or amend this Privacy Policy at any time to reflect changes in our practices, legal requirements, or technological advancements. Any material changes will be notified to parents/guardians via email or through a prominent notice on our website. Continued use of the application after such changes constitutes acceptance of the updated Privacy Policy.

### **17. TERMINATION**

This Privacy Policy shall remain in effect unless terminated by either party. We reserve the right to terminate this Privacy Policy at any time for any reason, with or without notice. Upon termination, all rights and obligations under this Privacy Policy shall cease, except those that by their nature should survive termination, such as obligations regarding the retention of personal information.

### **18. GOVERNING LAW AND JURISDICTION**

By using this App, you agree that any dispute arising out of or related to these terms shall be governed by the laws of the United States and the State of Delaware, without regard to its conflicts of law provisions.

#### **19. LIMITATION OF LIABILITY AND DISCLAIMER OF WARRANTIES**

We provide the App on an “as is” and as available basis without any warranties of any kind, express or implied, including but not limited to warranties of merchantability, fitness for a particular purpose, and non-infringement. Furthermore, we do not warrant that the application will be uninterrupted, error free, or free of viruses or other harmful components. In no event shall we be liable for any indirect, incidental, special, consequential, or punitive damages, including but not limited to loss of profits, data, use, or goodwill, arising out of or related to the use or inability to use the application.

#### **20. CONTACT INFORMATION:**

If there are any questions regarding this Privacy Policy, please contact us at [support@example.com](mailto:support@example.com) We will use reasonable means to respond within a reasonable timeframe.