



Privacy Policy

Amended Date: 16th January 2017

Effective Date: 1 October 2016

RoosterMoney (owned and operated by or on behalf of World Learning Limited by World Learning Ltd) collects information about you when you use our mobile applications, websites, and other online products and services ("Services") and through other interactions and communications you have with us.

In this policy, we describe what information we collect, how we collect it and what we do with that information. It covers both information about parents and children.

RoosterMoney is the responsible party or data controller regarding Personal Information collected through our Services. If you have any questions or concerns at any time about your data or privacy, please email us at hello@roostermoney.com

The Children's Online Privacy Protection Act ("COPPA") prohibits online service providers from knowingly collecting personally identifiable information from children under 13 years of age without verifiable parental consent or notice as applicable ("Consent"). Children under the age of 13 are prohibited from using certain features of the Service without Consent.

We are committed to protecting children's online privacy and complying fully with COPPA. We do not collect any personally identifiable information anywhere on the Sites or Apps except where expressly stated. We believe that children should be able to use the Internet in a safe, productive and efficient manner and should be afforded the highest protection available with respect to their Personal Information.

For that reason, the signup flow for the Service ensures that the individual registering for the account is a parent, and that the parent is over 18 years of age.

Children

We take many special precautions to protect the privacy of children under 13.

At our websites, online services or apps intended for children, we do not collect personal contact information (like full name, e-mail address, phone number or home address) from children (the "Personal Information") without the consent of a parent or legal guardian, except in limited circumstances authorized by law.

We collect some information (like IP address, mobile device UDID, operating system, etc.) automatically and use technology like cookies to provide functionality and support our operations. RoosterMoney does not permit interest-based advertising on



Sites or Apps directed to children under 13 or where we have actual knowledge that a child is under 13.

We work with third party service providers Google Analytics and Mixpanel to better understand your child's use of the service and to improve it. Google Analytics does not share this data with any other third parties. For more information on Google Analytics click [here](#) and for more information on Mixpanel, click [here](#)

We do not ask for more Personal Information than is necessary for a child to participate in an activity.

We take steps to prevent children from posting or publicly disclosing Personal Information.

Parents can ask us to update or delete their children's Personal Information.

Parents can revoke their consent and refuse the further use or collection of Personal Information from their child.

Process for parents accessing, deleting or withdrawing consent:

Should a parent wish to access or delete the information we've collected from their children they can do so from within the RoosterMoney app. Alternatively they can contact us by email at hello@roostermoney.com.

The email must contain all of the following :

- 1) the parent and account holder's email address
- 2) the child's username
- 3) The parent's relationship to the child.

How do we notify parents?

When a parent creates a RoosterMoney account, we let the parent know that the parent's consent is required for the collection, use, or disclosure of any personal contact information for the child (the "Personal Information"), and that we will not collect, use, or disclose any Personal Information from the child if the parent does not provide such consent;

We set forth the additional items of Personal Information that we may collect from the child, or the potential opportunities for the disclosure of Personal Information, should the parent provide consent;

We offer a hyperlink to the our privacy policy in the email; and

We let parent know how the parent can provide consent to the collection, use, and disclosure of the information.



Collection of information from adults and teens

We may collect the following kinds of Personal Information:

When you access our services, we collect information about your computer and about your visits to the Services, including your IP address, geographical location, browser, device, operating system, referral source, length of visit and page views.

When you open a Membership Account, we collect your name, email address, a password and any "nickname" you provide for identification.

When you add a child to your account, we collect your child's name, date of birth, gender, the currency they will earn, username and password. We may also collect your child's email or a profile picture of your child if you choose to add it. This information is not shared with any third parties.

When you subscribe to our website services, email notifications and/or newsletters, we collect your email address. We may also collect any other information that you choose to send to us.

When you contact us, we collect the information you submit to us.

When you or your child use the Services, we collect information on your transactional data (e.g. Allowances, Boosts, Removes and Goals being saved for).

We explain below how and when we would use this information.

Cookies

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

Cookies may be used in the following ways:

We may use "session" cookies (tracks you whilst you navigate the website) and "persistent" cookies (enables our website to recognise you when you visit).

Our third party analytics platforms may use cookies to generate statistical and other information to analyse the use of this website



You are able to reject the use of cookies with browsers. Some browsers allow you to reject all cookies; others, only allow you are to reject third party cookies. Blocking all cookies will have a negative impact upon the usability of our website, and many others.

Some of the services listed below may use Cookies to identify Users or they may use the behavioral retargeting technique, i.e. displaying messages tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

- 1) Google Analytics (<https://www.google.com/policies/privacy/>)
- 2) Mixpanel (<https://mixpanel.com/privacy/>)
- 3) SumoMe (<https://help.sumome.com/hc/en-us/articles/218958727-Privacy-Policy>)

Place of processing : USA – Privacy Policy

Use of information

We may use your Personal Information to:

Administer the Services;

Improve your browsing experience by the Services;

Enable your access and use of parts of the Services;

Send you general (non-marketing) commercial communications;

Send you email notifications, which you have specifically requested;

Send you our newsletter and other marketing communications relating to our business, which we we think may of interest to you, by post or, where you have specifically agreed, by email;

Deal with enquiries and complaints made by or about you relating to the Services.

Anonymous data may be used in internal business purposes or marketing /press purposes or its publication in the press.

However, we will not use your Personal Information to:

Provide to any third parties for the purpose of direct marketing, without your express consent;



For marketing purposes, without your express consent.

RoosterMoney does not permit marketing directed to children under 13 or where we have actual knowledge that a child is under 13.

We never share Personal Information that we receive online from or about children under 13 with third parties.

Retention time

Data is kept for the time necessary to provide the service requested, or stated by the purposes outlined in this document, and you can always request that we suspend or remove the data.

Disclosures

This refers to disclosures to our employees, officers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes as set out below.

We may disclose your Personal Information:

To the extent that we are required to do so by law;

In connection with any legal proceedings or prospective legal proceedings;

In order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);

To the purchaser (or prospective purchaser) of any business or asset which we are (or are contemplating) selling;

To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Information.

For the purposes of a business deal (or negotiation of a business deal) involving sale or transfer of all or a part of our business or assets (business deals may include, for example, any merger, financing, acquisition, divestiture or dissolution transaction or proceeding). In the event of an insolvency, bankruptcy, or receivership, personal information may also be transferred as a business asset. If another company acquires our company, business or assets, that company will possess the personal information



collected by us and will assume the rights and obligations regarding your personal information as described in this Policy.

International data transfers

We will process and transfer your Personal Information between any of the countries in which we operate in order to enable us to use the information in accordance with this privacy policy.

We may transfer information to countries which do not have data protection laws equivalent to those in force in our home jurisdiction. You expressly agree to such transfers of Personal Information.

Security of your Personal Information

We take appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of data collected.

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your Personal Information. We will store all the Personal Information you provide on our secure (password- and firewall-protected) servers.

Data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

You are responsible for keeping your password and user details confidential. We will not ask you for your password (except when you log in to the Services).

Policy amendments

We may update this privacy policy from time-to-time by posting a new version on the Services. You should check this page occasionally to ensure you are happy with any changes. By using the site and apps, you agree to any amendments we make to this policy. If we make any material changes to this policy, we will notify you at the email address you provided at registration.

Your rights

You may instruct us to provide you with any Personal Information we hold about you. You may instruct us not to process your Personal Information for marketing purposes by email at any time.



Third party websites

The Services may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

Your California privacy rights

California Civil Code Section § 1798.83 permits users of our software and services that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send e-mail to hello@roostermoney.com

Do Not Track signals

Some web browsers may transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is no standard that governs what, if anything, websites should do if they receive these signals. Mixpanel currently does not respond to "Do Not Track" browser signals or similar mechanisms. If and when a standard is established, we may revise our policy on responding to these signals. Third parties may collect personal information about your online activities over time and across sites when you visit the Sites or use the Mixpanel Service.

Updating information

Please let us know if the Personal Information which we hold about you needs to be corrected or updated.

PRIVO-Cert™ Safe Harbor Certification Program

RoosterMoney (owned and operated by World Learning Ltd) is a Member of the PRIVO-Cert™ Safe Harbor Certification Program ("the Program"). As a participating member in the Program, RoosterMoney (owned and operated by World Learning Ltd) adheres to the strict information collection, use and disclosure requirements set forth by the Program. PRIVO is an independent, third-party organization committed to safeguarding children's personal information collected online. PRIVO aims to help parents and their children exercise control over personal information while exploring the Internet. The PRIVO certification seal posted on this page indicates that RoosterMoney (owned and operated by World Learning Ltd) has established COPPA compliant privacy practices and has agreed to submit to PRIVO's oversight and consumer dispute resolution process. If you have questions or concerns about our



privacy practices, please contact us at +(844) 746-0976 or privacy@roostermoney.com. If you have further concerns after you have contacted us, you can contact PRIVO directly at privacy@privo.com.

Our details

Our Services are owned and operated by or on behalf of World Learning Limited, a UK company with offices at RoosterMoney, C/O Co-Work, 3rd Floor, 109 Borough High St, London SE1 1NL.

Our phone number is +(844) 746-0976

Contact

If you have any questions about this privacy policy or our treatment of your Personal Information, please email us: hello@roostermoney.com