



# Privacy Policy

*This Privacy Policy was published on May 24th 2018*

*It took effect on May 25th 2018*

We at RoosterMoney care deeply about your privacy. We believe in transparency, and we're committed to being upfront about our privacy practices, including how we treat your personal data.

When it comes to your personal data you are in control, and we've provided settings that allow you to choose how certain information is used by RoosterMoney.

This policy forms part of the RoosterMoney Conditions, and describes what information we collect in connection with those Conditions, how we collect it, what we do with that information, the legal basis for processing and the rights and choices you have over how we use your data. It covers the personal data of both parents and their children.

The previous version of the Privacy Policy can be viewed [here](#).

## 1. Our Role as Data Controller

RoosterMoney is the trading name of World Learning Limited ("RoosterMoney", "we", "us", "our") collects information about you when you use our mobile applications, websites, and other online products and services ("Service") and through other interactions and communications you have with us.

RoosterMoney is the responsible party or data controller regarding Personal Data collected through our Service. If you have any questions or concerns at any time about your data or privacy, please email us at [hello@roostermoney.com](mailto:hello@roostermoney.com).

Other service providers may also act as controllers in relation to your personal data:

- If you sign up for the paid RoosterPLUS subscription through our website, we use Stripe to process payments. In connection with this service that Stripe provides to RoosterMoney, Stripe may collect your Billing Information. The information that you provide through Stripe is subject to the [Stripe Privacy Policy](#). You should read the Stripe Privacy Policy to learn about Stripe's information collection, usage and your rights in that regard.
- If you sign up for the paid RoosterPLUS subscription from an iOS device, we rely on Apple iTunes to process the payments and manage the subscription. The information that you provide to Apple is subject to the [Apple Customer Privacy Policy](#). You should read the Apple Customer Privacy Policy to learn about Apple's information collection, usage and your rights in that regard.



## 2. Information we collect

We may collect, store and use the following kinds of personal data for processing on the basis specified in Annex A at the end of this Privacy Policy.

- Personal data to create your account
- Content you choose to upload to the app
- Email address and email preferences
- Usage information
- Log data and device information
- Cookies and similar technologies

## 3. Your children's information

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.

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 update or delete their children’s Personal Information within the app (this [help article](#) shows you how).



- 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 by deleting their child's profile from within the RoosterMoney app ([see how](#)). Alternatively they can contact us by email at [hello@roostermoney.com](mailto: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 our privacy policy in the email; and
- We let the parent know how they can provide consent to the collection, use, and disclosure of the information.

## 4. Cookies & Tracking

When you visit any web site, it may store or retrieve information on your browser or device, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience.

Because we respect your right to privacy, you can choose not to allow some types of cookies. However, blocking some types of cookies may impact your experience of the site and the services we are able to offer.

We may use the following types of Cookies:

- **Necessary cookies:** those required for the operation of the Service, which do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Analytical/performance cookies:** these allow us to collect information about how you use the Service, such as, how you move around our website and if you



experience any errors. These cookies do not collect personal data. The information collected is anonymous and is only used to help us improve the way the Service works, understand what interests our users generally and measure how effective our advertising is. Some of the performance cookies we use are issued as part of services provided by third parties, like Google Analytics.

- **Functionality cookies:** these are used to provide services or to recognise you when you return to our website. These would enable us to personalise our content for you, remember your preferences and improve your visit.
- **Targeting cookies:** these record your visit to the Service, the pages you have visited and the links you have followed. They are set by and linked to services provided by third parties, such as “Like” and “Share” buttons. The third party provides these services in return for recognising that you have visited our website. The third party may subsequently use information about your visit to target advertising to you on other websites and present you with advertisements that you may be interested in.

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. You will be able to manage your cookie preferences for your browser by accessing your browser’s Tools section (here are instructions for some commonly used browsers: [Chrome](#), [Internet Explorer](#), [Firefox](#)).

The 3rd party services we use 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.

Google Analytics ([Privacy Policy](#))

Mixpanel ([Privacy Policy](#))

SumoMe ([Privacy Policy](#))

Facebook Advertising ([Privacy Policy](#))

Google Advertising ([Privacy Policy](#))

Log file information will automatically be reported by your browser or mobile application each time you access our Sites or the RoosterMoney app. For example, when you access our RoosterMoney site, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, IP address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed and other such information.

Web beacons may be used via our 3rd party email service providers Mixpanel and Mandrill, to help us understand whether users have read our email messages and clicked on the links contained within those messages. This allows us to measure the performance and impact of our messages.



## 5. Choice and Control

We know that our RoosterMoney families value having control over their own information, so RoosterMoney gives you the choice of providing, editing or removing certain information, as well as choices about how we contact you. You may change or correct your family's account information through your account settings within the RoosterMoney app. You can also request the deletion of the personal information in your account.

You may also control the receipt of certain types of communications from RoosterMoney in your account settings. RoosterMoney may send you messages about the Service or your activity. Some of these messages are required, service-related messages for members (such as major changes to the services that will significantly impact you or legal notices). Other messages are not required, such as newsletters. You can control which optional messages you choose to receive by changing your account settings.

## 6. International data transfers

To facilitate our global operations RoosterMoney may transfer, store, and process your information with service providers based outside of Europe, e.g. North America. Laws may differ from the laws applicable to your Country of Residence. Where we transfer store, and process your personal information outside of Europe, we have ensured that appropriate safeguards are in place to ensure an adequate level of data protection, such as working with 3rd party providers that are certified under the EU-US Privacy Shield principles.

## 7. PRIVO Kids Privacy Assured Program

Rooster Money (owned and operated by World Learning Ltd) is a member of the PRIVO Kids Privacy Assured Program ("the Program") for COPPA Safe Harbor Certification. PRIVO is an independent, third-party organization committed to safeguarding children's personal information collected online.



The Program certification applies to the digital properties listed on the validation page that is viewable by clicking on the PRIVO COPPA certification seal. The certification seal posted on this page indicates Rooster Money (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 +44 (0)808 178 5352 or [privacy@roostermoney.com](mailto:privacy@roostermoney.com). If you have further concerns after you have contacted us, you can contact PRIVO directly at [privacy@privo.com](mailto:privacy@privo.com).





## 8. Security of your personal information

The security of your personal information is important to us. 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.

Your account information is protected by a password. We will not ask you for your password (except when you log in to the Service). It is important that you protect against unauthorised access to your account and information by choosing your password carefully and by keeping your password and computer secure, such as by signing out after using the Service.

If you have any questions about the security of your personal information, you can contact us at [hello@roostermoney.com](mailto:hello@roostermoney.com).

## 9. Retention

RoosterMoney will retain your information only for as long as is necessary for the purposes set out in this policy, for as long as your account is active (i.e., for the lifetime of your RoosterMoney member account), as described in this policy, or as needed to provide the Service to you. If you no longer want RoosterMoney to use your information to provide the Service to you, you may close your account (this [article](#) shows you how). RoosterMoney will retain and use your information to the extent necessary to comply with our legal obligations. We also retain log files for internal analysis purposes. These log files are generally retained for a brief period of time, except in cases where they are used for site safety and security, to improve site functionality, or we are legally obligated to retain them for longer time periods.

## 10. Your Rights

The table in Annex B at the end of this Privacy Policy explains the following rights you may have in relation to your personal data under the Data Protection Act (and any exceptions to those rights) and how you can exercise them:

- Right of access



- Right to rectification
- Right to erasure
- Right to request the restriction of processing concerning you
- Right to data portability
- Right to object to processing
- Right to ask us not to process your personal data for direct marketing purposes
- Right not to be subject to automated individual decision-making, including profiling

Please note that this Privacy Policy provides the confirmation referred to in relation to the Right of Access.

## 11. Privacy policy changes

We may amend or update this policy from time to time. If we believe that the changes are material, we'll let you know by sending you an email message to the email address provided at registration about the changes. 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.

## 12. Third party websites

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

## 13. Our details

World Learning Limited (trading as "RoosterMoney"), is a company incorporated in England and Wales (company number 06830114) with its registered office at 64 New Cavendish Street, London, W1G 8TB and business offices C/O Co-Work, 3rd Floor, 109 Borough High St, London SE1 1NL. We are registered with the Office of the Information Commissioner (registration number: ZA374824).

Our phone number is +44 (0)808 178 5352

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

## 14. Annex A

Personal Data Collected	Purpose	Basis for Processing
<p>a) Information you provide when creating your account:</p> <ul style="list-style-type: none"> <li>• First name</li> <li>• Last name</li> <li>• Email address</li> <li>• Password</li> <li>• Any “nickname” you provide for identification</li> <li>• Account currency</li> </ul> <p>b) Information you provide when adding a child:</p> <ul style="list-style-type: none"> <li>• Child’s first name</li> <li>• Date of birth</li> <li>• Gender</li> <li>• The currency they will earn</li> </ul> <p>c) Additional information you may provide when using the service:</p> <ul style="list-style-type: none"> <li>• Profile photos</li> <li>• Child’s Email Address</li> <li>• Child’s login details</li> <li>• Images you choose to upload to Goals or Jobs</li> </ul> <p>d) Records of any correspondence between you and RoosterMoney via email or through the App and Website’s ‘Contact US’ section</p>	<ul style="list-style-type: none"> <li>• To enable your use of the RoosterMoney services</li> <li>• To manage and administer the RoosterMoney services for internal operations, including data analysis, testing and research to ensure the content from our services is presented in the most effective manner for your device/computer;</li> <li>• To give you any notices under the Terms and Conditions;</li> <li>• To share service-related RoosterMoney message (such as those related to transactions, your account, security, or product changes)</li> <li>• To update RoosterMoney’s records;</li> <li>• To identify, prevent, detect or tackle fraud, and other crime;</li> <li>• To carry out checks required by applicable regulation or regulatory guidance;</li> </ul> <p>For the above purposes, RoosterMoney may disclose your personal data to any member of our group, which means our subsidiaries and our ultimate holding company</p>	<p>The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into the contract;</p> <p>The processing is necessary for compliance with a legal obligation to which we are subject;</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;</p>

	<p>and subsidiaries, based in the UK, in any part of the EEA or elsewhere.</p> <p>To disclose to third parties:</p> <ul style="list-style-type: none"> <li>• If it is under a duty to disclose or share your personal data in order to comply with any legal obligation;</li> <li>• To enforce this Privacy Policy, and the Terms and Conditions;</li> <li>• To agents and subcontractors, acting for us in providing or supporting a Service;</li> <li>• In the event that RoosterMoney sells any business or assets, in which case it may disclose your personal data to the prospective seller or buyer of such business or assets;</li> <li>• For audit purposes and to meet obligations to any relevant regulatory or legal authority.</li> </ul>	
<p>Information about the device(s) you use to access the RoosterMoney App and your use of the Services (including amongst other things hardware and software information, device information, access dates and times).</p>	<ul style="list-style-type: none"> <li>• To improve your app experience by personalising the Service</li> <li>• To develop and improve the App;</li> <li>• To ensure that content on the App is presented in the most effective manner for you and your device</li> </ul>	<p>The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into the contract;</p> <p>The processing is necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests</p>

	<p>To disclose to third parties for:</p> <ul style="list-style-type: none"> <li>• To agents and subcontractors, acting for us in providing or supporting a Service;</li> <li>• To enforce this Privacy Policy, and the Terms and Conditions;</li> </ul>	<p>are overridden by your interests or fundamental rights and freedoms which require protection of personal data;</p>
<p>Usage information about you and your children's interactions with RoosterMoney services (e.g. Allowances, Boosts, Removes, Jobs and Goals being saved for).</p>	<ul style="list-style-type: none"> <li>• To deal with customer support enquiries, complaints and feedback from you.</li> </ul>	<p>The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into the contract;</p>
<p>a) Your email address when you create a RoosterMoney account or sign up for receiving content on our Website</p> <p>b) Your device ID running the RoosterMoney App</p> <p>c) Information about the device(s) you use to access the RoosterMoney Website and your visits to and use of the Website (including your Internet Protocol address, location, browser/platform type and version, internet service provider, operating system, referral source, exit pages, length of visit, page views, website navigation and search terms used)</p>	<ul style="list-style-type: none"> <li>• To provide you communications you have opt-in to receiving such as our getting started tips, updates on family activity, and newsletter (which can be opted out from at any time from your email preferences within the app or in the unsubscribe link in the email);</li> <li>• To send push notifications from the RoosterMoney app if you enable it;</li> <li>• To improve your browsing experience by personalising the Service Website;</li> <li>• To develop and improve the Service;</li> <li>• To ensure that content on the Service Website is presented in the most effective manner for you and for your computer;</li> </ul>	<p>With your consent.</p>



<b>Your rights and how to exercise them</b>	<b>Exception</b>
<p><b>Right of Access:</b> To obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:</p> <ul style="list-style-type: none"> <li>a) the purposes of the processing;</li> <li>b) the categories of personal data concerned;</li> <li>c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular, recipients in third countries or international organisations;</li> <li>d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;</li> <li>e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing</li> <li>f) the right to lodge a complaint with a supervisory authority</li> <li>g) where the personal data are not collected from the data subject, any available information as to their source;</li> <li>h) the existence of automated decision-making, including profiling, referred to in Article 22(1) of the GDPR and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.</li> </ul> <p><b>How to exercise:</b> This Privacy Policy provides confirmation of the details required in relation to your right of access.</p> <p>Under the DPA, you have a right to access certain personal records that</p>	

<p>RoosterMoney holds about you. Any access request may be subject to a fee to meet RoosterMoney’s costs (as the case may be) in providing you with details of the information they hold about you if the request is unfounded or excessive.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a>.</p>	
<p><b>Right to rectification:</b> to obtain from us without undue delay the rectification of inaccurate personal data concerning you.</p> <p>We must communicate to each recipient to whom the rectified personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform the data subject about those recipients if the data subject requests it.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a>.</p>	
<p><b>Right to erasure:</b> to obtain from us the erasure of personal data concerning you without undue delay where:</p> <ul style="list-style-type: none"> <li>a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;</li> <li>b) you object to the processing based on legitimate interest where there are no overriding legitimate grounds for the processing;</li> <li>c) the personal data have been unlawfully processed;</li> <li>d) the personal data have to be erased for compliance with a legal obligation to which we are subject.</li> </ul>	<p>Processing is necessary for:</p> <ul style="list-style-type: none"> <li>a) compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; or</li> <li>b) the establishment, exercise or defence of legal claims.</li> </ul>

<p>We must communicate to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform the data subject about those recipients if the data subject requests it.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a>.</p>	
<p><b>Right to request the restriction of processing concerning you:</b> to obtain from us restriction of processing where:</p> <p>a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;</p> <p>b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;</p> <p>c) we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims;</p> <p>d) you object to the processing based on legitimate interest pending the verification whether our legitimate grounds override yours.</p> <p>We must communicate to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.</p> <p>We shall inform the data subject about those recipients if the data subject requests it.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a>.</p>	<p>Where processing has been restricted under this right, such personal data shall, with the exception of storage, only be processed:</p> <p>a) with your consent; or</p> <p>b) for the establishment, exercise or defence of legal claims; or</p> <p>c) for the protection of the rights of another natural or legal person; or</p> <p>d) for reasons of important public interest of the Union or of a Member State.</p>
<p><b>The right to data portability:</b> to receive the personal data concerning you which you</p>	<p>That right shall not apply to processing necessary for the performance of a task</p>

<p>have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where:</p> <p>a) the processing is based on consent or is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; and  b) the processing is carried out by automated means.</p> <p>You have the right to have the personal data transmitted directly from us to another controller, where technically feasible.</p> <p>The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to the right to erasure.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a>.</p>	<p>carried out in the public interest or in the exercise of official authority vested in us.</p>
<p><b>The right to object to processing:</b> to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on processing necessary for the purposes of the legitimate interests pursued by us or a third party (except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data), including profiling.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a>.</p>	<p>Where:</p> <p>a) we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject; or  b) for the establishment, exercise or defence of legal claims.</p>
<p><b>The right to ask us not to process your personal data for direct marketing purposes:</b> to object at any time to processing of personal data concerning you for such marketing, which includes profiling</p>	

<p>to the extent that it is related to such direct marketing.</p> <p>You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by using the unsubscribe link in RoosterMoney communications or by updating your email preferences in your Account Settings.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a></p>	
<p><b>The right not to be subject to automated individual decision-making, including profiling:</b> to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.</p> <p>You can exercise the right at any time by contacting RoosterMoney at <a href="mailto:privacy@roostermoney.com">privacy@roostermoney.com</a></p>	<p>If the decision:</p> <ul style="list-style-type: none"> <li>a) is necessary for entering into, or performance of, a contract between you and us;</li> <li>b) is authorised by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or</li> <li>c) is based on the data subject's explicit consent.</li> </ul> <p>In the cases referred to in points (a) and (c) we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on our part, to express his or her point of view and to contest the decision.</p>