

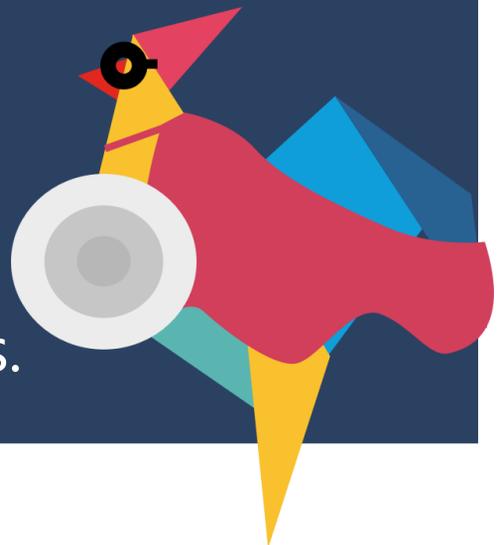
RoosterMoney Children's Privacy Policy

Published July 2018

What is a Privacy Policy?

All companies that handle personal data need to share how they collect and manage the data you choose to share with them, when signing up to use their services.

Like super heroes, companies have a duty to you in ensuring your data is kept safe and only managed in a way you agree with. This guide outlines how RoosterMoney does this.



What's covered?

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Before we get started...

RoosterMoney is the trading name of World Learning Limited.

Throughout the Privacy Policy, when we say "RoosterMoney", "we", "us" or "our", we are referring to World Learning Limited who own RoosterMoney.



1. Kids Privacy Assured by PRIVO: COPPA Safe Harbor Certification

RoosterMoney (owned and operated by World Learning Ltd) is a member of the PRIVO Kids Privacy Assured COPPA Safe Harbor Certification Program (“the Program”).

The Program certification applies to the digital properties listed on the validation page that is viewable by clicking on the PRIVO Seal. PRIVO is an independent, third-party organization committed to safeguarding children's personal information collected online.



The PRIVO COPPA certification Seal posted on this page indicates Rooster Money 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)203 984 8422 or privacy@roostermoney.com.

If you have further concerns after you have contacted us, you can contact PRIVO directly at privacy@privo.com.



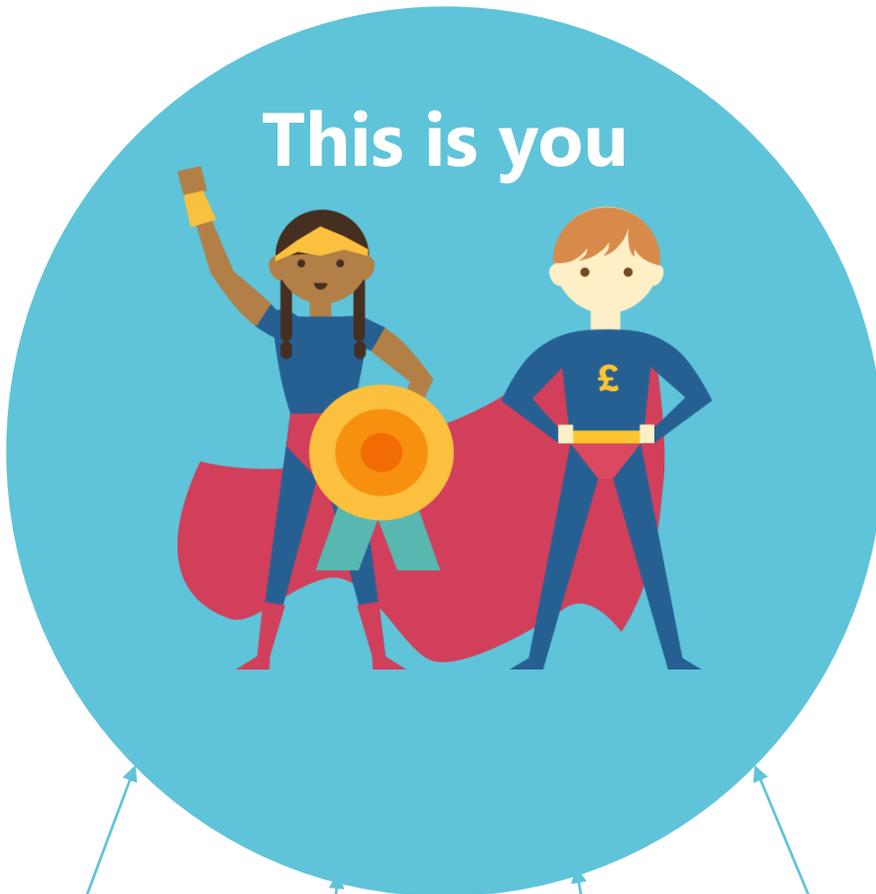
2. Your Privacy

When your parent sets up a RoosterMoney account for your family, and when you use the RoosterMoney App from your own phone or tablet, we collect certain information about you and your use of The RoosterMoney app (we sometimes may say “Service” when talking about the app in this policy).

Why have we created the Children’s Privacy Policy?

- Your personal data belongs to you, and we want you to understand what personal data RoosterMoney collects and how it is used.
- We want to help you better understand your rights over your personal data and precautions you can take to better secure it and keep it safe.
- Not only does RoosterMoney want to help you become financially independent, but digitally savvy as well!

3. So what do we mean by personal data?



And there is information that helps to identify you as being **YOU!**

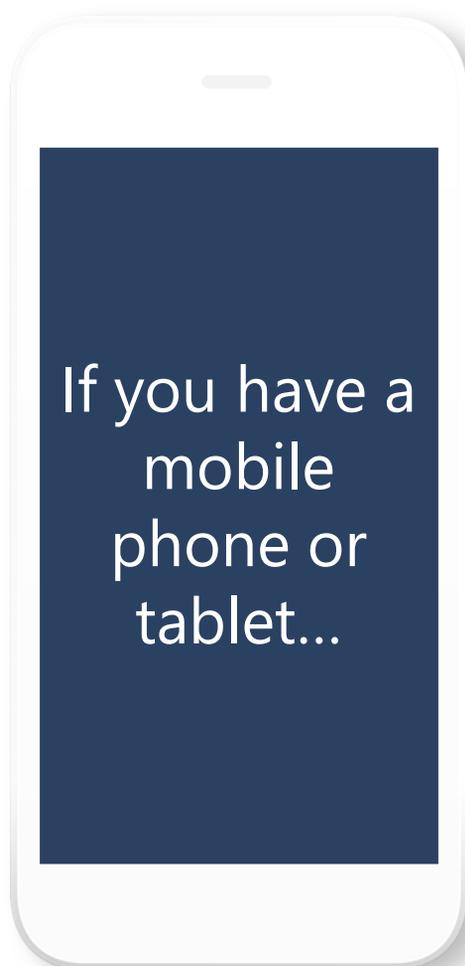
Your
NAME

Your
BIRTHDAY

Your
EMAIL

Your
PHOTO

Personal data doesn't only have to be something you can see...



these have a unique device ID – which is also seen as personal data if it can be helped to identify you.

4. What personal data gets collected for you?



When your parent creates a RoosterMoney account and adds a profile for you, they need to provide your:

- **First name**
- **Date of birth**
- **Gender**



They may choose to add extra personal data, like:

- **A profile photo**
- **Email address**
- **Login details**



If they set you up with your own login - so you can access your RoosterMoney account from your own smart phone or tablet - when you login for the first time, we automatically collect device information which includes:

- **Hardware information** (such as your device's unique ID)
- **Software information** (such as your device's operating system)
- **Usage information** (such as the app features you've used)

5. Why do RoosterMoney collect this data and how is it used?

- ✓ We use this data to provide you with our RoosterMoney services and give you a great experience when using the App.

FOR EXAMPLE:

Your name is used to help you know which account you're in – useful if you have brothers and sisters. If you're an only child, this is less of a problem, but we also use your name so we can address you directly within the app making the experience more friendly and personal.





We use usage information to better understand what features are being used in the app, fix any problems that may exist and to continue to develop and improve the services we provide to you and your family.

FOR EXAMPLE:

If we notice a feature isn't being used very much, we can use that insight to investigate why and improve it!

We will NEVER share your personal data without your parent's consent!



We do use these third party companies to help support our RoosterMoney services and we use their systems to process personal data so we can analyse the use of the app. This helps us improve the service that you receive from RoosterMoney.

Click to view their Privacy Policy:



Google
Analytics

mixpanel



INTERCOM

6. Your rights & control over your personal data

Right to be INFORMED

Companies aren't allowed to use your data without getting permission first. This permission is called 'consent' and it's the act of agreeing to something.

When your parents set up your RoosterMoney account, and added your details, they consented on your behalf to let us process your personal data so you could use the App. However, you have a right to know what personal data is shared with us and have the choice to say, "no – I don't want you to hold my personal data".



Right to ACCESS

You have the right to know how companies are using your personal data, if they are sharing it with anyone, and where this data is getting stored.

Right to RECTIFICATION

Rectification is another word for 'correcting'. If any data held on you is incorrect, you have the right to ask for it to be changed to something correct.



Can I get that changed please?

Right to ERASURE

If you are no longer using the app or don't want a company to have access to your data anymore, you have the right to have all your personal data removed and erased from their systems.

Some people call this the 'right to be forgotten'. This is because you're asking the company to forget about you and any data related to you!



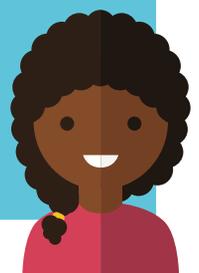
Right to RESTRICT PROCESSING

There are times where you can ask a company to not process certain bits of data that they may have stored about you.

For example, if the data they have on you is incorrect or your data is being processed in a way you didn't expect it to be.

Right to OBJECT

If you don't want your data to be shared with a company anymore, you have the right to say no, and stop your personal data from being used.



No Thanks

Right to DATA PORTABILITY

Portable is another word for being able to move or transport something.

In this case, this is the personal data on you within the app.

If you'd like to get a hold of that data so you can move it somewhere else, you can request that data in a format that can easily be read, and it will be shared in a reasonable time.



Rights in relation to AUTOMATED DECISION MAKING & PROFILING

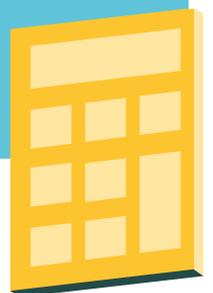
That's a mouthful, so let's break it down:

Automated decision making

When a company might be using bots or programmes to make a decision without any human involvement.

Profiling

When companies automatically use your personal data to make a decision on what type of customer you are and to predict what they think you want to see or are interested in. Sometimes this can be useful, but not when used irresponsibly to limit your choice and options.



Rights in relation to AUTOMATED DECISION MAKING & PROFILING

Here's an example of how automated decision making and profiling might be used:

When you're applying for your first mobile phone contract online, they may take the information you've given to decide if they can give you a contract or not, and what type of phones they think you might want.

If companies are doing this, they will need to let you know this is happening, and if you aren't happy with it, give you the option to request a human to get involved.



That's a whole lot of rights...

But what it does is give you the power over your data which is important when you choose to share it with another company.

If you want to exercise any of your rights with your RoosterMoney personal data, you can get in touch with us at **privacy@roostermoney.com** or speak to your parents who can check their Privacy Policy and see what steps they can take themselves.



7. Keeping your personal data safe

RoosterMoney have lots of safe guards to keep your data secure and safe on our systems, however there are things you can do as well to keep your own data safe (not just on RoosterMoney)!

A) Set a tricky password!

- **Choose one that you can remember but others won't be able to guess!**
- **When choosing what password to use, don't use the obvious 'password' or '123456'.**
- **It will make it even harder for people to guess it if you add both numbers and letters, with some being CAPITALS as well.**

Don't worry, if you forget what password you set, your parents can help you out.



B) Choose a non-obvious PIN

0000 is easy to put in, but also easy for someone to guess. Choose 4 numbers that you can remember, but won't be too easy to guess.

C) Switch user from your menu

You can use the 'Switch user' button to return back to your family's dashboard when you're done using the App.

To get back into your account you'll have to enter your PIN, but that means no one else can get in to your account that you don't want to.



8. Contact us



If you have any questions about this Privacy Policy or your personal data, you can email us at privacy@roostermoney.com.

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 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)203 984 8422.