

# Privacy Policy

This notice explains how JollyCo LLC (referred to as “we” in this notice) collects, uses, or otherwise processes the personal data of end users of our Services as defined below (referred to as “you” in this notice), and what rights you have if we are processing your personal data.

In this notice, “Services” refers to our Games, Websites, and any related services or properties we control; “Applications” refers to our games (“application”, “app”); and “Websites” refers to websites we control, including <https://www.jollyco.us> and <https://www.jollybattle.com>.

This page is used to inform visitors regarding our policies with the collection, use, and disclosure of Personal Data if anyone decided to use our Services. These Services are provided by JollyCo LLC and are intended for use as are.

We respect your privacy and are committed to handling your Personal Data with transparency and integrity. When processing Personal Data provided by you, we comply with the provisions of the General Data Protection Regulation (“**GDPR**”) (Regulation (EU) 2016/679 of the European Parliament and of the Council (27.04.2016) on the protection of private persons with regard to the processing of personal data and on the free movement of such data).

The terms “Personal Data” and “Processing” have the meaning set out in Art. 4 of the GDPR.

If you choose to use our Services, then you agree to the collection and use of the Personal Data in relation to this policy. The Personal Data that we collect is used for providing and improving the Services. We will not use or share your Personal Data with anyone except as described in this Privacy Policy.

The terms used in this Privacy Policy have the same meanings as in our [Terms of Use](#), which are accessible at our applications unless otherwise defined in this Privacy Policy.

## **Personal Data Collection and Use**

We do not collect classical Personal Data through our Services (such as you name, address, email or phone number) and you can use our Services without providing us with your classical Personal Data. We will receive your classical Personal Data (such as you name, address, email or phone number) only when you contact us directly and will use such Personal Data only to respond to your inquiry.

For a better experience, while using our Services, we may require you to provide us with certain personally identifiable data. The Personal Data that we request will be retained by us and used as described in this privacy policy.

To facilitate Services support, Services development and improvement as well as other services to you, you agree that we or other third parties may use analytic technologies to collect, use, store and transmit non-personally identifiable technical and related data regarding your mobile device (including unique device ID or UDID), IP address, geolocation, device maker and model, operating system. In addition, we and/or third parties may collect, store, use and transmit non-personally identifiable gameplay data, session data, carrier information as well as online and Services usage metrics, statistics and/or analytics. The Personal Data collected by third parties will be collected, used, stored, transferred and disclosed pursuant to the third party's Privacy Policy.

The Services do use third-party services that may collect and handle end-user Personal Data through technologies such as software development kits (SDKs).

Links to the privacy policy of third party service providers used by the Services:

- [Apple Privacy Policy](#)
- [Google Privacy Policy](#)
- [Unity Analytics](#)
- [Firebase Analytics](#)
- [Photon Privacy Policy](#)
- [AppsFlyer](#)
- [Facebook](#)

The Services may use the following ad serving services:

- [AdMob](#)

- [Unity Ads](#)
- [Facebook](#)
- [Twitter](#)

The ad serving services may collect and use your Personal Data, such as advertising ID, IDFA, IP address and other information that may be personal to you for the purpose of interest-based advertising. These ad serving services may operate under their own privacy policies.

If you wish to limit interest-based advertising, you can do so by limiting ad tracking in your device settings. For mobile advertising in apps, you can reset your Advertising Identifier and depending on your device, select to opt out of interest-based ads (Android) or turn on the Limit Ad Tracking setting (iOS). For display advertising on the Web, you can also adjust your browser settings to limit certain tracking by means of cookies, and by visiting the following sites: <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>.

### **User Preferences**

We collect data about user preferences for content animation, content appearance and most played mode. By preferences for content animation, we mean animation speed of certain graphical elements. By content appearance, we mean size of graphical elements. By played mode, we mean multiplayer or single player.

### **Data We Collect From Other Sources**

If you log into the App using a third-party site or platform such as Google Sign-In, or Apple Game Center, we access data about you from that site or platform, such as your screen name, profile information and friend lists, in accordance with the authorization procedures determined by such third-party site or platform provided that you have given the third party site in question such consent.

If you log into the App using a third-party site or platform, you represent and warrant that (i) your access and use of such features in connection with the App will comply with the applicable terms and policies of such site or platform; and (ii) that you are over the minimum

age limit that is prescribed for such third-party site or platform by the legislation in the individual jurisdictions.

## **Log Data**

We want to inform you that whenever you use our App, in a case of an error in the Services we collect data and information (through third-party products) on your phone called Log Data. This Log Data may include data such as your device Internet Protocol (“IP”) address, device name, operating system version, the configuration of the App when utilizing it, the time and date of your use of the App, and other statistics.

## **Cookies**

Cookies are files with a small amount of data that are commonly used as anonymous unique identifiers. These are sent to your browser from the websites that you visit and are stored on your device's internal memory.

Our Applications do not use these “cookies” explicitly. However, our Applications may use third-party code and libraries that use “cookies” to collect data and improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of our Applications.

Like most websites today, our Websites (<https://www.jollybattle.com> and <https://www.jollyco.us>) may use cookies, web beacons, tracking pixels (e.g., Meta Pixel, Twitter Pixel), API, and other similar technologies to provide measurement services and target ads. Cookies can be set by either the website you visit (“first-party cookies”) or a third party involved in providing content, functionality, or services such as analytics or advertising for the website you visit (“third-party cookies”).

Using your browser or device settings, you can control the use of cookies, for example by disabling some or all cookies or configuring your browser or device to notify you when cookies are being set. You can opt-out of the collection and use of information for ad targeting by accessing a mechanism for exercising such choice on <http://www.aboutads.info/choices> and <http://www.youronlinechoices.eu/>. However, please consider that disabling cookies may affect your ability to use the Websites.

You can also view your [Facebook ads settings](#) and update your preferences at any time.

We use third-party analytics technologies to facilitate our Websites support, development, and improvement. You are always free to opt out from the future collection of your personal data by Google Analytics by following instructions available on this link

<https://tools.google.com/dlpage/gaoptout>.

## **Service Providers**

We may employ third-party companies and individuals due to the following reasons:

- To facilitate our Services;
- To provide the Services on our behalf;
- To perform Service-related services; or
- To assist us in analyzing how our Service is used.

We want to inform users of our Services that these third parties have access to your Personal Data. The reason is to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

## **Transmission of Personal Data to Third Parties**

We do not share any Personal Data with third parties for their own use without your consent, unless it is either required by law or we determine that disclosure is reasonably necessary to enforce our rights, property or operations or to protect our players or third parties. We may share anonymous or aggregated information, or other data that does not directly identify you, with third parties, for instance your personal and game stats on leaderboards or to show trends about use of our App.

## **Security**

We value your trust in providing us your Personal Data, thus we are striving to use commercially acceptable means of protecting it. But remember that no method of

transmission over the internet, or method of electronic storage is 100% secure and reliable, and we cannot guarantee its absolute security.

### **Links to Other Sites**

Our Services may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, we strongly advise you to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

### **Children's Privacy**

We do not knowingly collect Personal Data from children under 13. In the case we discover that a child under 13 has provided us with Personal Data, we immediately delete this from our servers. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us at [info@jollyco.us](mailto:info@jollyco.us) that we will be able to do necessary actions.

In addition that we aim to comply with all privacy regulations worldwide, we also adhere to The Children's Online Privacy Protection Act (COPPA) (<http://www.coppa.org>) in the US.

### **Your Rights**

As an App User you have the rights explained in this section in accordance with Art. 12 to 23 GDPR. If you want to exercise any of your rights or receive further explanation about them please contact us at [info@jollyco.us](mailto:info@jollyco.us). Please note that some of these rights may be connected to certain statutory preconditions and thus, might not be applicable to you and your specific situation.

- **Right of access**

You have the right to gain access to the Personal Data that we process about you. Should you have any questions regarding the processing, or would you like to have more insight in the Personal Data about you that we process, you are always welcome to contact us and we will provide you with further information.

- **Right to rectification**

You can request from us to correct information inaccurately stored by us without undue delay. You also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

- Right to erasure / right to be forgotten

You have the right to request from us to permanently delete your Personal Data. You can make such a request if you for example believe that the Personal Data are no longer necessary in relation to the purpose for which the Personal Data were collected or otherwise processed.

- Right to restrict the processing activities

You have the right to restrict our processing activities. If you choose to restrict our processing activities as regards to the Services, you might not be able to use them.

- Right to data portability

You have the right to request from us that we send your Personal Data in a structured, commonly used and machine-readable format, and to transmit those data to another controller.

- Right to Object

You have the right to object to our processing of your Personal Data. If you choose to object to our processing activities, you might not be able to use all of our Services.

- Right to lodge a complaint with a supervisory authority

If you are unsatisfied with the way we treat your Personal Data you may reach out to us at all times to solve the issue. However, you always have the right to lodge a complaint with a supervisory authority.

- Right to Withdraw Consent

You have the right to withdraw consent at any time. The withdrawal of your consent will not affect the lawfulness of the processing based on consent before its withdrawal.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Thus, you are advised to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

### **Governing Law**

This Privacy Policy is governed by, and shall be interpreted, construed and enforced in accordance with, the laws of the state of Florida, without giving effect to any choice of law or conflict of laws provisions that would cause the application of the law of any other State or jurisdiction. The Parties acknowledge and agree that the state of Florida has a substantial relationship to the circumstances, transactions and events giving rise to this Privacy Policy.

### **Choice of Forum**

The Parties hereby irrevocably and unconditionally submit to the exclusive jurisdiction of, and venue in, any state or federal court in City of Miami, Florida (Miami-Dade County) (“a Permitted Court”) for the purposes of any legal action or lawsuit arising out of this Privacy Policy or any of the transactions or obligations contemplated thereby, and in each case appropriate appellate courts therefrom. Neither Party shall commence any such legal action or lawsuit in a court other than a Permitted Court. The Parties hereby irrevocably and unconditionally waive any objection that such Party might now have or in the future have, and shall not plead or claim, that any such legal action or lawsuit brought in a Permitted Court has been brought in an inconvenient forum. The Parties further irrevocably and unconditionally waive any objection to the laying of venue of such legal action or lawsuit in a Permitted Court.

### **Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us.

*Last modified: April 29, 2022.*