

# Notice at Collection and Privacy Policy

## For DT's Test Apps

**Last Updated:** February 24<sup>th</sup>, 2025

We at Digital Turbine (IL) Ltd. d/b/a "Digital Turbine" and our affiliated entities within our group of companies (collectively, "**DT**", "**we**", "**us**" or "**our**"), put great efforts into making sure that we secure personal information and use it properly.

The notice at collection (the "**Notice at Collection**") and Privacy Policy (the "**Policy**") below explain to end-users ("**Users**") of our mobile Test Applications (the "**Test Apps**", e.g. Jewel Royal Saga and Zumba Ocean) our privacy practices for processing personal information related to them when they use our Test Apps.

We operate and provide the Test Apps as a business, within the meaning of US Privacy Laws, or as a controller, within the meaning of the GDPR, UK GDPR, or the LGPD (collectively: "**controller**").

The term "**personal information**" refers to information that identifies an individual or relates to an identifiable individual or as otherwise defined under Test Applicable data protection and privacy laws of the United States ("**US Privacy Laws**"), or to "personal data" as defined under the General Data Protection Regulation ("**GDPR**") and under the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 ("**UK GDPR**"), or the Brazil's data protection law ("Lei Geral de Proteção de Dados Pessoais", or "**LGPD**"), as applicable (collectively: "**Privacy Laws**").

The Notice at Collection and Policy also explains certain rights that Users have under Privacy Laws and how they may exercise them.

The general part of the Policy applies to all end users of the Test Apps, regardless of where they use our Test Apps from. **Annex 1** includes supplemental terms regarding our processing of personal information under the GDPR and UK GDPR, and **Annex 2** includes supplemental terms about our processing of personal information under the LGPD.

Please take the time to read our full Notice at Collection and Policy. If you disagree with our Notice at Collection and/or the following Privacy Policy, please do not access or otherwise use our Test Apps.

The Policy Summary below will give you a quick and clear view of our practices. The first six headings in the summary also serve as the Notice at Collection.

| Notice at Collection and A Summary of the Policy |                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------|-------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| NOTICE                                           | <b>Categories of personal information</b> | You provide us and/or our Ad monetization partners with information when you use the Test Apps, or when you interact with the Test Apps, including when behavioral ads are delivered to you on the Test Apps. Such information may include personal information related to you, such as: <ul style="list-style-type: none"><li>Information about a User's device such as device type and model, network provider, browser type, language, device IP address, operation system, and network connection type.</li></ul> |
|                                                  | <a href="#">Read More</a>                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|---------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                   | <ul style="list-style-type: none"> <li>Advertising ID (Apple IDFA, if the User has provided permission to use it, or Google AAID) App user ID, Vendor ID on iOS devices (IDFV).</li> <li>The Test Apps' package name, keywords, and version.</li> <li>Further details related to the additional data that DT's SDK may collect and process for contextual Test Apps targeting (as applicable) is available at: <a href="https://developer.DT.com/hc/en-us/articles/360010959798-Contextual-App-Targeting-for-the-Post-IDFA-Era">https://developer.DT.com/hc/en-us/articles/360010959798-Contextual-App-Targeting-for-the-Post-IDFA-Era</a>.</li> </ul> <p>Additionally, our Ad monetization partners also make use of tracking technologies (such as tags or pixels) to collect performance data when your device interacts with their Ads, such as your clicks and views of their Ad, to measure the performance of their Ad.</p>                                                                                                                                                                                                                                                                             |
| <b>Categories of sensitive personal information</b><br><a href="#">Read More</a>                  | <p>The Test Apps is not intended to collect sensitive personal information (within the meaning of Privacy Laws). We do not knowingly collect sensitive personal information, we do not process sensitive personal information for the purpose of inferring characteristics about you, and we do not sell or share sensitive personal information for cross-context behavioral advertising.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>What do we do with personal information?</b><br><a href="#">Read More</a>                      | <p>We use personal information to maintain the Test Apps, make it better and continue developing it, to protect us and the Test Apps from misuse and law violations, and to provide you (either directly or through our Ad monetization partners) with personalized Ads.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Who do we disclose, share, or sell personal information with?</b><br><a href="#">Read More</a> | <p>We use service providers and other third parties to support the Test Apps, for example, to store data and for analytics on the Test Apps. We also allow our Ad monetization partners to collect personal information from the Test Apps by using an SDK (Software Developer Kit) that is integrated with the Test Apps, or other tracking technologies. These third parties Ad monetization partners do not pay us to collect information. Still, their collection of personal information may be considered as disclosure for the purpose of sale or sharing for cross-context behavioral advertising.</p> <p>At any time, you can opt-out of the collection of personal information by our service providers and ad monetization partners by visiting our <a href="#">Do Not Sell or Share My Personal Information</a> page.</p> <p>We will be using third-party programmatic ad exchanges to deliver personalized ads to you while you are using the Test Apps.</p> <p>We will transfer information when we change our corporate structure, and we will share the information with our affiliate entities. We will obey orders and other lawful requirements by authorities to disclose information.</p> |
| <b>How long do we retain personal information?</b><br><a href="#">Read More</a>                   | <p>We retain personal information for the length of time required to provide the Test Apps and for legitimate and lawful purposes.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

|  |                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <b>Your choices and rights</b><br><a href="#">Read More</a>                                 | <p>You have several opt-out options with respect to our processing of personal information related to you. For example, you may opt-out of using the Test Apps by deleting the Test Apps from your device via the Android standard setting.</p> <p>You also have privacy rights under applicable Privacy Laws, which you can contact us to exercise.</p> <p>You can also exercise your right to opt-out of selling or sharing personal information by visiting our <a href="#">Do Not Sell or Share My Personal Information</a> page.</p> |
|  | <b>Children</b><br><a href="#">Read More</a>                                                | <p>We do not knowingly sell or share personal information related to children, as such term is defined under applicable Privacy Laws.</p>                                                                                                                                                                                                                                                                                                                                                                                                 |
|  | <b>Exercising your choices and rights</b><br><a href="#">Read More</a>                      | <p>You can stop using the Test Apps and delete it at any time, and thereafter, we will stop collecting personal information related to you. You may request to exercise the rights detailed under the <i>"Your Choices and Rights"</i> section by submitting your request to us by emailing: <a href="mailto:privacy@digitalturbine.com">privacy@digitalturbine.com</a>. You may also control what personal information we collect from your device by changing the permissions settings on your mobile device.</p>                       |
|  | <b>Transfer of personal information outside your territory</b><br><a href="#">Read More</a> | <p>We keep personal information related to you in the United States and will store them at additional sites at our discretion. Our service providers/processors provide us with adequate security and confidentiality commitments when they process personal information related to you, on our behalf.</p>                                                                                                                                                                                                                               |
|  | <b>Tracking technologies</b><br><a href="#">Read More</a>                                   | <p>Tracking technologies are tools and techniques used to collect information about a user's activity on the Test Apps. They are used in numerous ways, for example, when analyzing traffic on mobile applications or tracking user's behavior.</p> <p>To opt-out of our use of non-essential tracking technologies, you can control the data your device shares with the Test Apps by visiting you Android settings, either by visiting the "Test Apps" setting, or by using the device's "Permission Manager".</p>                      |
|  | <b>Aggregated and analytical information</b><br><a href="#">Read More</a>                   | <p>Aggregated data is not identifiable and, therefore, not personal information. We use it for legitimate business purposes and standard analytical tools.</p>                                                                                                                                                                                                                                                                                                                                                                            |
|  | <b>Information security</b><br><a href="#">Read More</a>                                    | <p>We implement systems, applications, and procedures to secure personal information related to you, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information.</p>                                                                                                                                                                                                                                                                                                                       |
|  | <b>Dispute resolution</b><br><a href="#">Read More</a>                                      | <p>Contact us at: <a href="mailto:privacy@digitalturbine.com">privacy@digitalturbine.com</a> or write us for every request and complaint. We will make good-faith efforts to resolve any existing or potential dispute with you.</p>                                                                                                                                                                                                                                                                                                      |
|  | <b>Changes to this policy</b><br><a href="#">Read More</a>                                  | <p>We will update our policy from time to time after giving proper notice.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

**Contact us**  
[Read More](#)

Please contact us at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com) for further information.

# The Digital Turbine Privacy Policy

## Categories of personal information

When you use our Test Apps, we receive any information you enter on the Test Apps or give us in any other way.

You provide us or our Ad monetization partners with information when you use the Test Apps, or when you interact with us or with an Ad presented to you on the Test Apps. Such information may include personal information related to you, such as

- Information about a User's device such as device type and model, network provider, browser type, language, device IP address, operation system, and network connection type.
- Advertising ID (Apple IDFA, if the User has provided permission to use it, or Google AAID).
- The Test Apps' package name, keywords, and version.
- The Test Apps' user ID and the ID of the Vendor on iOS devices (IDFV).
- Further details related to the additional data that the SDK integrated with the Test Apps may collect and process for contextual app targeting is available at:  
<https://developer.DT.com/hc/en-us/articles/360010959798-Contextual-App-Targeting-for-the-Post-IDFA-Era>.

When you contact us, or when we contact you, we will receive and process any personal information that you choose to provide us with. At your sole discretion, you may choose to provide us with information regarding your use of the Test Apps when you contact us.

Additionally, the advertisers of our third-party Ad monetization partners obtain information when your device interacts with their Ads that are displayed on the Test Apps.

When you use the Test Apps, we and/or our Ad monetization partners also collect information about your activities on the Test Apps, for example, the duration of time you spend on the Test Apps' sessions and the content that you have viewed or engaged with.

In the preceding 12 months, we have collected the following categories of personal information:

- Identifiers and Personal information categories listed in the applicable US Privacy Laws, such as the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
- Commercial information, including services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, and apps installations.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with the Test Apps.

We obtain the categories of personal information related to you listed above from the following categories of sources:

- Directly and indirectly from you and your activity on the Test Apps.
- Third parties such as reliable service providers and ad monetization partners.

Note that the advertisers of our third-party ad monetization partners are independent businesses that place their own tracking technologies on our Test Apps for the purpose of providing you with personalized Ads.

Their privacy practices may differ from ours, and they collect and process personal information also for their own purposes, subject to their applicable privacy notices.

## **Categories of sensitive personal information**

The Test Apps is not intended to collect sensitive personal information (within the meaning of Privacy Laws).

We do not knowingly collect sensitive personal information and require you not to provide us with any such information.

We do not process sensitive personal information for the purpose of inferring characteristics about you, and we do not sell or share sensitive personal information for cross-context behavioral advertising.

## **What do we do with personal information?**

We use personal information related to you for the following purposes:

- to provide you and other Users the Test Apps including specific features of the Test Apps;
- to provide you with notifications related to your use of the Test Apps;
- where the provision of feedback is available, to provide your feedback;
- to provide you with technical support related to our Test Apps;
- to maintain the Test Apps and to make it better for you and other Users;
- to continue developing the Test Apps; and,
- to provide you with content and/or experiences that may include targeted Ads made available on the Test Apps by third parties, Ad monetization partners.

We obey the law and expect you to do the same. If necessary, we will use personal information related to you to enforce our terms, policies, and legal agreements, to comply with court orders and warrants, and assist law enforcement agencies, to collect debts, prevent fraud, misappropriation, infringements, identity thefts and any other misuse of the Test Apps, and to take any action in any legal dispute and proceeding.

We commit to only process personal information related to you for the purposes described in this policy.

## Who do we disclose, share, or sell personal information with?

Personal information related to you is disclosed to certain members of our staff who receive appropriate information security and privacy training, external consultants, and to our affiliates, who are all governed by this Policy.

We also disclose personal information related to you to our agents worldwide and to third-party service providers that process personal information about you on our behalf. Such agents and service providers will be contractually bound to keep personal information related to you confidential and appropriately secure.

A merger, acquisition, or any other structural change will require us to transfer personal information related to you to another entity as part of the structural change, provided that the receiving entity will comply with this Policy.

We may engage third parties to provide us with services such as analytics, marketing automation, and user experience, and for these purposes only, we may allow them to collect personal information on our Test Apps.

Additionally, as detailed above, we allow ad monetization partners to collect and use personal information for the purpose of providing content, including sponsored and promoted content and contextual or personalized ads.

The categories of personal information collected by these third parties in the preceding 12 months include identifiers, online activities, and inferences drawn from such activities.

These third parties do not pay us for collecting such information, but the right granted to them to collect personal information may be considered as disclosure for the purpose of sale or sharing for cross-context behavioral advertising. **At any time, you can opt-out of the collection of personal information** by our service providers and Ad monetization partners by visiting our [Do Not Sell or Share My Personal Information Page](#).

We will also need to disclose personal information related to you in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We will disclose, share, or sell personal information related to you only subject to the terms of this Policy or subject to your prior consent.

## How long do we retain personal information?

We retain different types of personal information related to you for different periods, depending on the purposes for processing the information, our legitimate business purposes, and pursuant to legal requirements under applicable law.

We may maintain your contact details to help us stay in contact with you in case such information was provided to us by you. You can contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com) and request to delete your contact details. Note that we will keep your details without using them if necessary, and for the necessary period of time, for legal requirements and proceedings.

We may retain personal information related to you after you have terminated your use of the Test Apps, if retention is reasonably necessary to resolve disputes between Users, to prevent fraud and abuse, or to enforce this policy.

We will keep aggregated non-identifiable information without limitation and to the extent reasonable, we will delete or de-identify potentially identifiable information, when we no longer need to process the information.

In any case, we will keep information about you for as long as you use the Test Apps unless applicable law requires us to delete it or if we decide to remove it at our discretion, according to the terms of this policy.

## Children

We do not knowingly sell or share personal information related to children, as such term is defined under applicable Privacy Laws.

## Your choices and rights

- **Access.** You have the right to confirm whether we are processing personal information about you and to access such information, including to request to know:
  - what personal information we have collected about you;
  - the categories of personal information;
  - the categories of sources from which the personal information is collected;
  - the business or commercial purpose for collecting, selling, or sharing such information;
  - the categories of third parties to whom we disclose personal information; and,
  - the specific pieces of personal information we have collected about you.
- **Correction.** You have the right to request that we correct inaccurate personal information that we maintain about you.
- **Deletion.** You have the right to request that we delete personal information related to you that we have collected from you, subject to certain exceptions under applicable Privacy Laws. Accordingly, note that when we delete personal information related to you that we have collected from or about you, it will be deleted from our active databases, but we will keep a reasonable number of copies in our archives. We will continue to retain the personal information related to you for legitimate business purposes as set forth above.
- **Portability.** When exercising your right of access detailed above, you also have the right to obtain the personal information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another entity without hindrance. Note that you may only exercise this right no more than two times per calendar year. Also note that when responding to your request, we will omit any information that would disclose our trade secrets, as permitted by applicable Privacy Laws. You may also have the right to obtain a representative summary of personal data information that you previously provided to us.
- **Opt-out rights.** You have the right to opt-out of the sale or sharing of personal information related to you by us, or otherwise the use of such information for targeted advertising or profiling for the purpose of making decisions that produce legal or similarly significant effects concerning you. As detailed above, we allow our service providers and the advertisers of our third-party Ad monetization partners to collect personal information related to you and to provide you with

personalized ads. Under some US Privacy Laws, such activity may constitute sharing or selling (within the meaning of US Privacy Laws) of personal information related to you. Accordingly, you have the right to request to opt-out of such third parties' collection of personal information as further detailed below under the section titled "*Exercising your choices and rights*".

- **Non-discrimination.** You have the right not to receive discriminatory treatment by us for exercising your privacy rights detailed in this Policy.
- If you are in the European Economic Area (EEA), you might have additional rights under the General Data Protection Regulation (GDPR). Please read our Supplemental Terms for Processing Personal Data Under the GDPR in **ANNEX 11** attached hereto.
- If you are a resident of Brazil, you might have additional rights under the LGPD (Lei Geral de Proteção de Dados Pessoais), the Brazil's data protection law. Please read our Supplemental Terms for Processing Personal Data Under the LGPD in **ANNEX 22** attached hereto.

## Exercising your choices and rights

We will give you choices about the ways we use and share personal information related to you, and we will respect the choices you make.

We collect and receive personal information related to you that we need for the purposes described in this Policy. You can stop using the Test Apps at any time, thereafter we will stop collecting personal information related to you. However, we will store and continue to use or make available certain personal information related to you as detailed above.

You may also control what personal information we collect from your device by changing the permissions settings on your browser or mobile device.

You may request to exercise the rights detailed above by submitting your request to us at [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com), or by using the relevant online form linked below:

[Delete My Data](#)

[Give Me My Data](#)

[Do Not Sell or Share My Personal Information Page](#)

Only you or a person authorized to act on your behalf may make a request related to personal information related to you. A request for access can be made by you only twice within a 12-month period.

The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with the requested personal information if we cannot verify your identity or authority to make the request and confirm the personal information related to you. We will only use the personal information provided in your request to verify your identity or authority to make the request.

We will do our best to respond to your request within 30 days of its receipt. If we require more time (up to additional 30 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such a decision and provide you with a cost estimate before completing your request.

We will not require that you create an account in order to exercise your rights under this Policy and we will not increase the cost or decrease the availability of the Test Apps based solely on the fact that you have chosen to exercise one of your rights under applicable Privacy Laws.

After receiving our reply, you can appeal against our decision by contacting us. We will review your appeal and provide you with our answer and our explanation of the reasons for our decision(s) within 60 days of receiving it. We will also provide you with a link (to the extent available) to submit a complaint with the relevant Attorney General.

## **Transfer of personal information outside your territory**

We store and process information, including personal information, either directly or by using third parties such as data hosting service providers, in the US.

If you are a resident in a jurisdiction where transfer of personal information related to you to another jurisdiction requires your consent, then you provide us your express and unambiguous consent to such transfer.

We make sure that our third-party service providers, provide us with adequate confidentiality and security commitments and we will take all steps reasonably necessary to ensure that personal information related to you is treated securely and in accordance with this policy.

## **Tracking technologies**

This section of the Policy explains how we and certain third-party service providers may use tracking technologies in our Test Apps.

Tracking technologies are tools and techniques used to collect information about a user's activity on the Test Apps, such as device identifiers, usage data, location data, log data, etc.

Tracking technologies are used in numerous ways, for example, when analyzing traffic on mobile applications or tracking user's behavior. They help mobile applications to recognize users' devices and remember their activities.

Our Test Apps uses the following tracking technologies:

| Tracking Technology Name | Purpose                         | Essential/Optional | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------|---------------------------------|--------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SDK                      | Collect data and deliver Ads    | optional           | <ul style="list-style-type: none"> <li>Information about a User's device such as device type and model, network provider, browser type, language, device IP address, operation system, and network connection type.</li> <li>Advertising ID (Apple IDFA, if the User has provided permission to use it, or Google AAID).</li> <li>Test Apps user ID, vendor ID in iOS devices (IDFV).</li> <li>The Test Apps' package name, keywords, and version.</li> <li>Further details related to the additional data that the SDK that is integrated with the Test Apps may collect and process for contextual app targeting (as applicable) is available at: <a href="https://developer.DT.com/hc/en-us/articles/360010959798-Contextual-App-Targeting-for-the-Post-IDFA-Era">https://developer.DT.com/hc/en-us/articles/360010959798-Contextual-App-Targeting-for-the-Post-IDFA-Era</a>.</li> </ul> |
| Ad tags/pixels           | Monitor Ad campaign performance | optional           | performance data (views and clicks)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

By using the Test Apps, you consent to us accessing your device and storing data on your device. To opt-out of our use of non-essential tracking technologies, you can control the data your device shares with the Test Apps by visiting your Android iOS settings. There are two ways to do this:

- **App Settings:** For Android, go to "Settings">"Apps", find our Test Apps, and tap "Permissions" to manage your choices. For iOS, go to Settings">"Apps & Notifications", find our Test Apps, and tap "Permissions" to manage your choices.
- **Permissions Manager.** For Android, go to "Settings">"Security and Privacy">"Permission Manager", and tap each type of permission to manage which mobile applications has such permission. For iOS, go to "Settings">"Security and Privacy", and tap each type of permission to manage which mobile applications has such permission.

## Aggregated and analytical information

We use anonymous, statistical, or aggregated information and will share it with our partners for legitimate business purposes. It has no effect on your privacy, because there is no reasonable way to extract data from the aggregated information that we or others can associate specifically to you.

## Information security

We are committed to ensuring the security of personal information. We and our hosting services implement systems, applications, and procedures to secure personal information related to you, to minimize the risks of theft, damage, loss of information, or unauthorized access or use of information. These measures provide sound industry standard security.

However, please understand that no security system is impenetrable, and although we make efforts to protect your privacy, we cannot guarantee that the Test Apps will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

## **Dispute resolution**

We do periodical assessments of our data processing and privacy practices, to make sure that we comply with this policy, to update the policy when we believe that we need to, and to verify that we display the policy properly and in an accessible manner. If you have any concerns about the way we process personal information related to you, you are welcome to contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com), or write to us.

We will look into your query and make good-faith efforts to resolve any existing or potential dispute with you.

## **Changes to this Policy and our Notice at Collection**

From time to time, we will update this policy. If the updates have minor if any consequences, they will take effect 14 days after we post a notice on the Test Apps. Substantial changes will be effective 30 days after we initially posted the notice.

Until the new policy takes effect, if it materially reduces the protection of your privacy under the then-existing policy you can choose not to accept it and terminate your use of the Test Apps. Continuing to use the Test Apps after the new Policy takes effect means that you agree to the new policy. Note that if we need to adapt the policy to legal requirements, the new policy will become effective immediately or as required by law.

## **Contact Us**

Please contact us at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com)

## ANNEX 1

### Supplemental Terms for Processing Personal Data Under the GDPR

We at DT describe our privacy practices in connection with the mobile Test Applications (the “**Test Apps**”, e.g. Jewel Royal Saga and Zumba Ocean) on our Notice at Collection and Privacy Policy above (the “**General Policy**”). Please take the time to read our General Policy.

These terms supplement and are not a substitute for our General Policy. They add terms specifically related to our privacy practices associated with processing personal data under European data protection laws, namely the General Data Protection Regulation (EU) 2016/679 (“**GDPR**”).

You should read both documents to understand the full scope of our privacy practices. If there are any overlapping provisions, these supplemental terms will prevail for our processing of personal data under the GDPR.

These terms use certain defined terms under the GDPR, such as “personal data”, “processing”, “consent”, “data controller” and “lawful grounds of processing”. If you are not familiar with these terms, please seek further guidance or contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com) with any questions that you may have about these terms.

#### Lawful Grounds of Processing

We process personal data related to you as a data controller when you use our Test Apps based on the following lawful grounds:

- We provide you with targeted ads and will process personal data related to you for this purpose.
- We will process personal data related to you to comply with our legal obligations and where necessary, to protect your and others' vital interests.
- We will rely on our legitimate interests, which we have a good-faith belief that is not overridden by your fundamental rights and freedoms, for the following purposes:
  - To protect our Test Apps and our networks and systems, including cyber security measures.
  - To provide support, customer relations, and for service operations.
  - To enhance and improve your and other users' experience with our Test Apps.
  - To detect, contain, prevent, and handle cases of fraud and misuse of our Test Apps.
- We will also rely on your consent for processing personal data related to you. Where consent is applicable, we will present you with an option to provide and withdraw it.

#### Your Rights Under the GDPR

In addition to your applicable rights as described under our General Policy, you have the following rights:

- AT ANY TIME, YOU CAN CONTACT US AND REQUEST TO WITHDRAW YOUR CONSENT TO THE PROCESSING OF PERSONAL DATA RELATED TO YOU. EXERCISING THIS RIGHT WILL NOT AFFECT THE LAWFULNESS OF PROCESSING BASED ON CONSENT BEFORE ITS WITHDRAWAL.

- Request to access personal data that we keep about you and receive further information as described under the GDPR. If you find that the personal data related to you is not accurate, complete or up to date, please provide us the necessary information to correct it.
- Request to delete or restrict access to personal data related to you. We will review your request and use our judgment, pursuant to the provisions of the applicable law, to reach a decision about your request.

If we need to delete personal data related to you following your request, it will take some time until we completely delete residual copies of personal data related to you from our active servers and from our backup systems.

- If you exercise one (or more) of the above-mentioned rights, in accordance with the provisions of applicable law, we will also take reasonable steps to inform other third-party controllers with whom we have shared personal data about you about your request.
- You may ask to transfer personal data related to you in accordance with your right to data portability.
- You may object to the processing of personal data related to you for direct marketing purposes, such as by unsubscribing from our newsletters and distribution lists. Additional information about this right is available under the choice section in this policy.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affecting you.
- You have a right to lodge a complaint with a data protection supervisory authority of your habitual residence, your place of work or the place of an alleged infringement of your rights under the GDPR.

Please note that when you send us a request to exercise your rights, we will need to reasonably authenticate your identity and location. We will ask you to provide us credentials to make sure that you are who you claim to be and will ask you further questions to understand the nature and scope of your request.

If you have any concerns about the way we process personal data related to you, you are welcome to contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com). We will investigate your inquiry and make good-faith efforts to respond promptly. If we are unable to help, you also have the right to make a complaint to the applicable data protection supervisory authority, as aforementioned.

## **Our DPO and Representatives**

Our Data Protection Officer can be reached at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com).

Our EEA designated representative is: Rickert Rechtsanwaltsgesellschaft mbH and can be reached at: Colmantstraße 15, 53115 Bonn, Germany, [art-27-rep-digitalturbine@rickert.law](mailto:art-27-rep-digitalturbine@rickert.law).

## **Transfer of Personal Data Outside the EEA**

The Test Apps are provided to you by an Israeli entity, Digital Turbine (IL) Ltd., d/b/a "Digital Turbine". Note, that the European Commission determine, on the basis of article 45 of Regulation (EU) 2016/679 that Israel is country outside the EU that offers an adequate level of data protection.

We store and process personal information about you in the U.S.

From time to time, we will make operational decisions which will have an impact on the sites in which we maintain personal data.

We make sure that our third-party service providers provide us with adequate confidentiality, data protection and security commitments in accordance with the GDPR, and we will take all steps reasonably necessary to ensure that personal data related to you is treated securely and in accordance with our General Policy and these supplemental terms.

We may transfer personal data related to you to other countries. Some of them are not recognized by the European Commission as providing adequate protection to personal data, and some of them, although recognized, required additional safeguards. We will use appropriate safeguards, in particular, by way of entering into the European Union (EU) Standard Contractual Clauses with the relevant recipients, by relying on self-certifications, or by complying with equivalent data transfer mechanisms. You can contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com) to receive more information related to our data transfer practices.

Please also see the section below titled "US Transfers" for additional information regarding our transfers of personal data outside the EEA to the US.

## ANNEX 2

### Supplemental Terms for Processing Personal Data Under the LGPD

We at DT describe our privacy practices in connection with the mobile Test Applications (the “**Test Apps**”, e.g. Jewel Royal Saga and Zumba Ocean) on our Notice at Collection and Privacy Policy (the “**General Policy**”). Please take the time to read our General Policy.

These terms supplement our General Policy. They add terms specifically related to our privacy practices associated with processing personal data under Brazilian data protection laws, namely the Brazilian General Data Privacy Law (Lei Geral de Proteção de Dados Pessoais). We will refer to them as the “**LGPD**”).

You should read both documents to understand the full scope of our privacy practices. If there are any overlapping provisions, these supplemental terms will prevail, for our processing of personal data under the LGPD.

These terms use certain defined terms under the LGPD, such as “personal data”, “processing”, “consent”, “data controller” and “lawful grounds of processing”, as translated from the official version of the LGPD in Portuguese. If you are not familiar with these terms, please seek further guidance or contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com) with any question that you may have about these terms.

#### Lawful Grounds of Processing

We process personal data related to you as a data controller when you use the Test Apps based on the following lawful grounds:

- We provide you with targeted ads and will process personal data related to you which is necessary for this purpose.
- We will process personal data related to you to comply with our legal obligations and where necessary, to protect your and others' vital interests.
- We will rely on our legitimate interests, which we have good-faith belief that they are not overridden by your fundamental rights and freedoms, for the following purposes:
  - To communicate with you, including for direct marketing purposes.
  - To protect our services and our networks and systems, including by using cyber security measures.
  - To provide support, customer relations and for service operations.
  - To enhance and improve yours and other users' experience with the Test Apps.
  - To detect, contain, prevent and handle cases of fraud and misuse of our Test Apps.
- We will also rely on your consent for processing personal data related to you. Where consent is applicable, we will present you with an option to provide it and an option to withdraw it.

#### Your Rights Under the LGPD

In addition to your applicable rights as described under our General Policy, you have the following rights in relation to personal data related to you:

- Confirmation of the existence of the processing;
- Access to the personal data related to you (i.e., obtain a copy);
- Correction of incomplete, inaccurate or out-of-date personal data related to you;
- Anonymization, blocking or deletion of unnecessary or excessive personal data related to you or personal data related to you processed in noncompliance with the provisions of the LGPD;
- Portability of the personal data related to you to another service or service provider, by means of an express request and subject to commercial and industrial secrecy, pursuant to the regulation of the controlling agency;
- Deletion of personal data related to you processed with your consent, except in the situations provided under the LGPD;
- Information about public and private entities with which we shared personal data related to you;
- Information about the possibility of denying consent and the consequences of such denial;
- Revocation of your consent as provided under the LGPD.

Please note that when you send us a request to exercise your rights, we will need to reasonably authenticate your identity and location. We will ask you to provide us credentials to make sure that you are who you claim to be and will ask you further questions to understand the nature and scope of your request.

If you have any concerns about the way we process personal data related to you, you are welcome to contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com). We will investigate your inquiry and make good-faith efforts to respond promptly. If we are unable to help, you also have the right to make a complaint to the applicable data protection supervisory authority, as aforementioned.

## **Our DPO**

Our Data Protection Officer can be reached at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com).

## **Transfer of Personal Data Outside Brazil**

The Test Apps are provided to you by an Israeli entity, Digital Turbine (IL) Ltd., d/b/a "Digital Turbine".

We store and process personal information about you in the U.S.

From time to time, we may make operational decisions which will have an impact on the sites in which we maintain personal data.

We make sure that our third-party service providers provide us with adequate confidentiality, data protection and security commitments in accordance with the LGPD, and we will take all steps reasonably necessary to ensure that personal data related to you is treated securely and in accordance with our General Policy and these supplemental terms.

We will transfer personal data related to you to other countries. Some of them provide a degree of protection of personal data appropriate to the provisions the LGPD. In other cases, we will use appropriate safeguards by way of entering into standard data transfer agreements with the relevant recipients, or by relying on other applicable data transfer mechanisms. You can contact our privacy team at: [privacy@digitalturbine.com](mailto:privacy@digitalturbine.com) to receive more information related to our data transfer practices.