

## **Privacy Policy**

Effective Date: May 25, 2018

Groom Lake Development, LLC (“Groom Lake,” “we,” “our,” or “us”) provides this privacy policy to describe how we collect, use, share, and otherwise process the information of individuals who use our Groom Lake mobile applications (collectively “App”).

### **Information Collection**

When using our App, you may voluntarily provide information about yourself, such as your name and email address. You provide this information when you contact us or interact with us for any purpose. We also collect technical information during your use of our App, including device type, date and time you accessed our App and your usage behavior within the App. We may use cookies or similar technologies to collect this technical information. See the Digital Advertising & Analytics section of this privacy policy to learn more about the use of this information and the choices available to you.

### **Information Use**

We use the information we collect for various purposes, including the following:

- To provide our products to you, including to process in-App purchases you make;
- To maintain, improve, and personalize your experience of our App;
- To respond to your inquiries or contact you as you request, including for customer service and support purposes;
- To run a promotion, contest, survey or other App feature;
- To comply with the law; and/or
- As otherwise disclosed at the time information is collected.

We do not use automatic decision-making or engage in profiling that results in legal effects or similarly significant affects.

Where we intend to process your information for a purpose other than the purpose for which it was collected, we will provide you with information regarding the purpose for the processing, as well as other relevant information, prior to processing your information for the new purpose.

### **Information Sharing**

We may share information that personally identifies you with third parties, including the following:

- Affiliated companies;
- As part of a corporate sale, merger, or acquisition, or other transfer of all or part of our assets including as part of a bankruptcy proceeding;

- Pursuant to a subpoena, court order, governmental inquiry, or other legal process or as otherwise required by law, or to protect our rights or the rights of third parties; or
- With your consent or as otherwise disclosed at the time of data collection or sharing.

We may share information that has been de-identified or aggregated without limitation.

### **Digital Advertising & Analytics**

We may partner with ad networks and other ad serving providers (“Advertising Providers”) that serve ads on behalf of us and others on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your use of the App and other sites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising. Our App may include Advertising Providers such as [AdColony](#), [AppLovin](#), [Chartboost](#), [Facebook](#), [Fyber](#), [Google](#), [HyprMX](#), [InMobi](#), [Tapjoy](#), [Unity](#), and [Vungle](#). These networks determine independently how to use your information, so review their linked privacy policies to learn more.

We may also work with third parties that collect data about your use of the App and other sites or apps over time for non-advertising purposes. Your use of the App is subject to the applicable third party’s privacy policy including: [Fabric](#), [Facebook](#), [Flurry](#), [GameAnalytics](#), and [Google](#). Groom Lake uses third-party services to improve the performance of the App and for analytics and marketing purposes. Groom Lake uses these services to improve the performance of the App and for analytics and marketing purposes. These third parties determine independently how to use your information, so review their linked privacy policies to learn more.

### **Third-Party Links and Tools**

The App may provide links to third-party apps. We do not control the privacy practices of those apps, and they are not covered by this privacy policy. You should review the privacy policies of other apps that you use to learn about their data practices.

The App may also include integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share personal data or you otherwise interact with these features on the App, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public. Your interactions with third-party companies and your use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to carefully read the privacy policies of any accounts you create and use.

### **Children**

We do not knowingly collect personal data from individuals under 16, or the relevant age in your jurisdiction. If we become aware that a child has provided us with personal data, we will take

steps to delete such information. If you become aware that a child has provided us with personal data, please contact us using the information in the Contact section below.

### **International Visitors**

This section applies to those that download our App in the European Economic Area and Switzerland.

### **Lawful Basis for Processing**

On certain occasions, we process your personal data when it is necessary for the performance of a contract to which you are a party, such as to provide services to you. We may also process your personal data to respond to your inquiries concerning our products and services.

On other occasions, we process your personal data where required by law. We may also process your personal data if necessary to protect your interests or the interests of a third party.

Additionally, we process your personal data when we have a legitimate interest in doing so and this interest is not overridden by your data protection rights. Where we process your personal data for this purpose, our legitimate interest is to improve our services and keep our App secure.

If the processing of personal data is necessary and there is no statutory basis for such processing, we will ask for your consent to process your personal data. You have the right to withdraw your consent to processing of personal data at any time.

If you wish to exercise the right to withdraw consent, please contact us using the information in the Contact section below.

### **Transfers of Personal Data**

Please be aware that the personal data we collect may be transferred to and maintained on servers or databases located outside your state, province, country, or other jurisdiction, where the privacy laws may not be as protective as those in your location. If you are located outside of the United States, please be advised that we process and store personal data in the United States and your consent to this privacy policy represents your agreement to this processing.

### **Your Rights**

You have a right to the following:

- To request access to the personal data we hold about you;
- To request that we rectify or erase your personal data;
- To request that we restrict or block the processing of your personal data;
- Under certain circumstances, to receive personal data about you that we store and transmit to another without hindrance from us, including requesting that we provide your personal data directly to another, i.e., a right to data portability; and
- Where we previously obtained your consent, to withdraw consent to processing your personal data.

To exercise these rights, contact us using the information in the Contact section below. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence.

### **Retention**

We will process and store your information only for the period necessary to achieve the purpose of the storage, or as permitted by law. The criteria used to determine the period of storage of information is the respective statutory retention period. After expiration of that period, the corresponding information is routinely deleted, as long as it is no longer necessary for the fulfillment of a contract or the initiation of a contract.

### **Changes to Our Privacy Policy**

If our information practices change, we will post these changes on this page. We encourage you to visit this page periodically to learn of any updates.

### **Contact**

If you have questions, comments, or concerns about this privacy policy, please contact us, in our role as data controller, at:

Groom Lake Development Attn: Privacy Policy  
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