

AVVYLAND PRIVACY POLICY

Last modified: May 27, 2021

INTRODUCTION

We developed the AVVYLAND universe where, through a mobile application “**AVVYLAND**” (our “**App**”) or otherwise, you can create your own virtual worlds – Branes – for creative, commercial, or social activities. You can realize your ideas by building 3D objects in augmented reality (AR) and placing them in the real world, share your experiences with others and use other features and services (the “**Services**”).

In order to provide you with the Website, App and Services, we need certain information about you. We are committed to protecting your privacy.

This Privacy Policy describes:

- The types of information we may collect or that you may provide when you download, install, access, or use the App or our Website (www.avvyland.com).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy applies only to information we collect in the App, on our Website, in email, and other electronic communications sent through or in connection with our App and our website.

This Privacy Policy does not apply to information that:

- we collect offline or on any other apps or websites of AVVYLAND or its affiliates, including websites you may access through this App.
- you provide to or is collected by any third party.

Other websites and apps, and other third parties may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not use our Website, nor download or use our App. By using our Website, downloading, or using our App, you agree to this Privacy Policy. This policy may change from time to time. Your continued use of the Website and/or App after we revise this Privacy Policy means you accept those changes, so please check the policy periodically for updates.

You should also read our Website Terms of Use and Terms of Service which set out the agreement between you and AVVYLAND.

WHO WE ARE AND HOW TO CONTACT US

Avvyland, Inc., a company registered in the State of Delaware, is the operator of the Website and App and is responsible for making decisions about how we use your personal information (also referred to as ‘AVVYLAND’, the ‘Company’, ‘we’, ‘us’ or ‘our’ in this policy).

If you have any questions about this Privacy Policy, please contact us using the details below:

- **Name:** Avvyland, Inc., registration no. 3163433
- **Address:** 919 North Market Street, Suite 950, Wilmington, New Castle, Delaware, 19801
- **Email address:** privacy@avvyland.com

CHILDREN UNDER THE AGE OF 18

Our Website, App and Services are not intended for children under 18 years of age, and we do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at privacy@avvyland.com.

THE INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

We aim at providing you a great experience through our Website and App while minimizing data collected from the users. Most of the information collected to enable Services and different features of the Website and App cannot be used to identify you. Where we collect personal information, we only use it for the purposes described in this Privacy Policy and apply security measures (including anonymization and encryption).

This Privacy Policy covers our use of any information that can or could be used to identify you or your household ("**personal information**"). It does not cover information which cannot be used to identify you.

What information do we collect?

We may collect and process information you provide to us when you create and upload User Content through our App or when you contact us. In addition to the information directly provided by you, we collect and process technical and behavioral information about your device, your use of the App and Services.

Learn more

We may collect and process the following information:

- **Identity Data:** your first and last name, username, country of residence.
- **Contact Data:** your email address or any other identifier by which you may be contacted online or offline; we also collect records and copies of your correspondence (including email addresses), if you contact us.
- **Profile Data:** your anonymous internal account ID that is assigned automatically by our system; your inventory (such as blocks available to you) and your in-app purchase history (where applicable).
- **Content Data:** User Content you make available through our Website, App and Services, including the objects you build and place in the real world. We also process metadata connected to the User Content, which may include your anonymous internal ID and data you choose to provide with your User Content such as captions.
- **Location Data:** your device location information, identified using such technologies as GPS, Wi-Fi points through which you access the Services and cell tower triangulation.
- **Device Data:** information about your browser, mobile device, including IP address, unique device identifiers, device OS, model, configuration, and settings; mobile device camera, microphone.
- **Usage Data:** information regarding your use of our Website, App and Services, such as how you engage with the App, how you interact with content through the App and problems encountered.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal information but will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

How is the information collected?

We may use different methods to collect data from and about you, including through direct interactions with you, by use of automated technologies, from third parties (including providers of technical services or analytics providers) and from publicly available sources.

Learn more

- **Information you provide to us.** This is information (including Identity, Contact, and Profile Data) you consent to giving us about you by filling in forms on the Website, App and Services (if applicable), or by corresponding with us (for example, by email). It includes information you

provide when you subscribe for the newsletter or otherwise register on our Website, download the App, make an in-App purchase (where applicable), use the Services and share User Content (such as built objects) via the App, and when you report a problem with the App or our Services. If you contact us, we will keep a record of that correspondence.

- **Information collected automatically.** Each time you use our Website or App we will automatically process personal information including Device, Content and Usage Data. We process this data using cookies and other similar technologies. Please see COOKIES section below for more details.
- **Information we receive from third parties.** You may choose to share certain data with us from third parties, or we may collect such third-party data automatically. For example, we may receive information about you from analytics providers (such as Google).

How do we use the information about you?

We will only use your personal information when the law allows us to do so. Most commonly we will use your personal information in the following circumstances:

To provide you with the Website, App and Services

We need to process certain personal information, so you can use the Services and enjoy different features of the Website and App. This allows us to perform the Services in accordance with our Terms of Service.

Learn more

- We process Device Data to operate the Services for you. We also use this information to provide technical and customer support to you.
- Your mobile device camera is accessed by the App to enable AR features, for example, when you build objects with blocks or place them in the real world. Augmented reality is the main feature of our App. Use of AR requires access to the mobile device camera.

When you first use such Services, you will be asked for permission to access your mobile device camera. You can withdraw your consent at any time by disabling access in your device settings. However, most of our Services will not work unless you enable such access.

- We process your Location Data as you use our Services. The Services on our App are location-based, the core feature of our Services is to provide you an interactive experience connected to your real-world location. Processing of the Location Data also allows you to see nearby objects built and placed by other users in the real world, while you are using the App.

If you wish to enjoy such features of our App, you will be asked to consent to your Location Data being used for this purpose. You can withdraw your consent at any time by disabling location services in your device settings. However, most of our Services will not work unless you turn the location services on.

- We use Identity, Contact and Profile Data to manage our relationship with you including when you communicate with us (for example, for subscribing for our newsletter, requesting information, or making a complaint).

In accordance with our legal obligation or legitimate interest

We may need to process certain information to comply with a legal or regulatory obligation, such as to carry out analysis and test our Website and/or App to ensure their stability and security. We may also use certain personal information to improve our Website and/or App and to deliver a better and more personalized experience to you.

Learn more

In order to provide you an interactive experience where you can improve your creativity, we may use your personal information to:

- administer and protect our business and administer the Website and App, including troubleshooting, data analysis and system testing
- ensure your safety and security by reviewing User Content (for example, when we receive a complaint) and associated metadata for breach of our Terms of Service, Community Guidelines, and/or other applicable rules
- ensure the content is presented in the most effective manner for you and your device
- monitor trends so we can improve our Website, App and Services
- offer new or additional features of our Website, App and Services

We may also use your personal information (including Content, Device and Usage Data) to help us detect abuse, fraud, and illegal activity on the Website or App and to ensure that we provide fair experience to all users.

In addition, we may use your personal information to establish, exercise or defend legal claims.

If you fail to provide personal information

Where we need to collect personal information by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (i.e., to provide you with Services available through our Website and/or App). In this case, we may have to cancel the services you have with us, but we will notify you if this is the case at the time.

WHO WE SHARE INFORMATION WITH

We share your personal information with third-party service providers who help us deliver the Website, App and Services to you and analytics providers. We may also share your information with other companies within the AVVYLAND group of companies. Where required by law, we will share your personal information with public authorities, law enforcement agencies, regulators, or such other authorities.

Learn more

We may disclose aggregated information about our users and information that does not identify any individual without restriction. In addition, we may disclose personal information that we collect, or you provide:

- to our subsidiaries and affiliates.
- to contractors, service providers, and other third parties we use to support our business, including: to administer and provide services, including to run, operate and maintain our Website and App; to perform analytics; to provide technical and customer support; and to process payments for in-app purchases. Such service providers may also include professional advisers such as lawyers, auditors, and insurers, who provide consultancy, legal, insurance and accounting services.

These service providers will process on our behalf only such personal information as required for the purpose of performing the services. We make sure that each service provider is contractually obliged not to process your personal information for any other purpose.

Some external service providers may also collect information directly from you (such as to process payments for in-app purchases, where applicable) in accordance with their own privacy policy.

- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of AVVYLAND's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by AVVYLAND about our Website and/or App users is among the assets transferred.
- to fulfill the purpose for which you provide it.
- for any other purpose disclosed by us when you provide the information.
- with your consent.

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- to enforce our rights arising from any contracts entered into between you and us, including our Terms of Service, and for billing and collection (where applicable).
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of AVVYLAND, our customers or others.

Information shared with other users

When you use our Website, App or Services, certain personal information may be shared with other users. This includes your User Content (such as built objects and the information you choose to include in your creation) which may be visible to other users of our Services. **You choose to share such information with other users by making the User Content available through the App.**

Where you or other users opt to share User Content, published on or made with our App (such as built blocks), on third-party social media platforms, such User Content will be shared on those platforms. We do not control and are not responsible for the practices of these third-party sharing features, their terms of service and their privacy policies.

COOKIES

We may use cookies and/or other similar technologies to distinguish you from other users of the Website or App. This helps us provide you with a good experience when you use our Website or App, allows us to improve the Website, App and Services and helps prevent fraudulent activity.

The technologies we use for automatic information collection (collectively, "**cookies**") may include:

- **Cookies (or mobile identifiers):** small text files that are placed on your computer or device by a web server when you access our Services.
- **Web Beacons:** small electronic files (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit, for example, to count users who have visited those pages and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

We may place and access cookies on your computer or device, which are known as "first party cookies". Cookies may also be placed and accessed by third parties, which are known as "third party cookies".

It may be possible to refuse mobile cookies by activating the appropriate setting on your browser and/or smartphone. However, if you select this setting, you may be unable to access certain parts of our Website and/or App.

The types of cookies described above may be "**session cookies**" or "**persistent cookies**". Session cookies are only stored on your device whilst you are using our App and Services and are deleted when you log off from the Services or close the App. Persistent cookies remain on your device for a period of time after you log off from the Services or close your browser.

Third Party Cookies

Some third-party service providers that we engage may place their own cookies on your hard drive or device when you use our Website, App and Services. These cookies may provide information to those third parties about your browsing habits or may be used for security.

Our Website and App may contain cookies from third-party analytics providers, which help us compile aggregated statistics about the effectiveness of our operations. These technologies enable the analytics providers to set or read their own cookies or other identifiers on your device, through which they can collect information about your online activities across applications, websites, or other products.

Our Website and App may use Google Analytics, a web analytics service provided by Google, Inc. ("Google"). They may use cookies that are stored on your computer or mobile device and contain information about your visit: duration, visited pages, country, browser type, device type, etc. To learn more about Google Analytics, including how to opt out of it, please visit <https://policies.google.com/technologies/partner-sites>.

When You Visit Third Party Websites or Service

If you visit or use third party websites or services, those third parties may place cookies or similar technologies on your computer or device. For more information about what cookies or similar technologies those third parties use, please review the third-party services' cookie policies.

How "Do Not Track" requests are handled

Our App and our Website do not support "Do Not Track" requests. To determine whether any of third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Website, App or Services may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** We will send you our newsletter and promotional offers if you subscribe for it. If you do not wish to have your email address or other contact information used by the Company to promote our own or third parties' products or services, you can opt-out at any time by sending us an email stating your request to privacy@avvyland.com. If we have sent you a promotional email, you may follow the "unsubscribe" link provided in your email or send us a return email asking to be omitted from future email distributions.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by checking the relevant box located on the form on which we collect your data (the registration form and/or cookie settings). You can also always opt-out by sending us an email with your request to privacy@avvyland.com.

ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

You may send us an email at privacy@avvyland.com to request access to, correct, or delete any personal information that you have provided to us. We may not be able to delete your personal information except by also terminating your access to the Website or App. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Content from the App, copies of your User Content may remain viewable in cached and archived pages or might have been copied or stored by other App users. Proper access and use of information provided on the App, including User Content, is governed by our Terms of Service.

DATA SECURITY

All information you provide to us is stored on our secure servers. Once we have received your information, we will use strict procedures and security features to try to prevent your personal information from being accidentally lost, used, or accessed in an unauthorized way.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website or App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We urge you to be careful about giving out information in public areas of the App. The information you share in public areas (including through blocks placed in the real world) may be viewed by any user of the App. Make sure that you do not submit any personal information that you do not want to be seen, collected, or used by other users.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Website or App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

CHANGES TO THE PRIVACY POLICY

We keep our Privacy Policy under regular review. This version was last updated on the date stated at the beginning of this document. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App, or access or log onto our Website. The new policy may be displayed on-screen, and you may be required to read and accept the changes to continue your use of the Website, App, or the Services.

You are responsible for periodically visiting this Privacy Policy to check for any changes.