

Privacy Policy

Effective Date: October 19, 2018

BAT TECHNOLOGY CO., LIMITED (“we,” “us,” “our” or “Batmobi”) is a mobile advertising company that provides application developers with a platform to deliver advertising to their consumers. Our technology enables our partners to show mobile application users more relevant advertising that is based on users’ interest in applications. In order to provide these services, we collect and use certain information about user activity in mobile applications.

The Batmobi Privacy Policy (this “Policy”) explains how we collect, use, and share information through our advertising platform (“Services”), as well as your choices related to that information.

Advertising Services Privacy Policy

This section describes the information we collect, use, and share through our Services.

Information Collection and Use

If you are a consumer that downloads and uses an application which contains the Batmobi SDK or otherwise interacts with the Services, we may collect certain device information including the following:

- Internet browser user-agent used to access the Services;
- Google advertising ID (GAID);
- Identifier for advertisers (IDFA);
- Country, time zone and locale settings (country and preferred language);
- Operating system Name / Operating system Version;
- Package name and properties of mobile application through which a consumer interacts with the Services;
- Network connection type;
- IP Address;
- Device properties related to screen resolution & RAM and Number of CPU cores;
- Model.

This device information may be collected across mobile apps over time. This type of information may include transactional data related to a consumer’s interaction with an application, such as information about the actions taken in an application like purchases or application installations.

Using the information we collect, we are able to deliver the Services, improve them, and research and develop new ones.

Information Sharing

We may share information we collect or derive with third parties for the following purposes:

- With service providers that perform services on our behalf;
- To provide our clients with the Services, such as to deliver relevant advertising, and to provide attribution;
- For analytics and research purposes;
- In response to subpoenas, court orders, or other legal processes;
- To protect our or a third party's legal rights or to defend against a legal claim;
- As part of a business transfer such as a merger, acquisition, or at bankruptcy.

Opt-Out:

To opt-out of our collection of information from mobile devices, please visit your device's settings to set the "Limit Ad Track" or other similar feature on your device.

Note that if you opt-out you will still see advertising on your device, but it may be less relevant to your interests. In addition, if you reset your device identifier or use a different device you may need to renew your opt-out.

Children's Online Privacy Protection Rule

We do not knowingly collect personal information from children under the age of 13 except as permitted by U.S. law. For example, we may collect certain types of information (e.g., IDFAs) from apps that are directed toward children for activities that fit within the "support for internal operations" exception from the notice and consent requirements in the Children's Online Privacy Protection Rule.

Data Security and Retention

We implement reasonable measures to help secure the information we collect through the Services. We retain the data we collect through the Services for up to 2 years. Information is automatically purged from our system if the Services do not receive any updated information for a device in the last 2 years. Note that we will retain information in our systems for as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Website Privacy Policy

This section describes the information we collect, use, and share through our Site.

Information Collection

We may collect various types of information through the Site. For example, when you register with Batmobi to use our Services you may provide us with personal information such as your name, email address, mailing address, user name, and password. You may also provide us with payment information, or other information when you complete the online forms available on the Site.

Information Use

We may use the information we collect or you provide to us through the Site for various purposes, including:

- To communicate with you, for example through newsletters or with other information about our products and services;
- To operate and improve the Site and our Services;
- To customize the Site;
- For analytics and research;
- For marketing purposes;
- For purposes disclosed at the time of collection.

Information Sharing

We may share information collected through the Site for purposes including:

- With your consent;
- For advertising and marketing purposes;
- In response to a subpoena, court order, or other legal process;
- To protect our rights and the rights of others;
- As part of a sale, merger, or acquisition, including at bankruptcy; and
- For purposes disclosed at the time of collection.

Updating Information

You can update the personal information you provide to us by correcting, updating or deleting the information associated with your Batmobi account, or by contacting us to request access to the personal information about you that we hold.

Your Choices

Third parties may collect information from the Site and other non-affiliated websites and mobile applications over time in order to deliver relevant advertising to your browser or device, as well as other browsers or devices associated with you. This type of advertising is called interest-based advertising.

To learn more about interest-based advertising on your browser, and your choices regarding this type of advertising for companies that participate in this choice mechanism by visiting <http://preferences-mgr.truste.com/>. If you are in the European Union you can visit <http://www.youronlinechoices.eu/> to exercise choice. You may also limit the collection of information from mobile apps on your device for interest-based advertising us by adjusting the settings on your mobile device. For iOS mobile devices, go to “Settings” from your Device’s home screen; scroll down to “Privacy”; select “Advertising”; and turn on “Limit Ad Tracking.” For Android mobile devices, go to “Google Settings” on your Device; select “Ads”; and check the box labeled “Opt Out of Interest-Based Ads.”

Please note that if you exercise choice you will still receive advertising, but it may be less relevant to your interest. Additionally, data may still be collected from your browser or device for purposes other than interest-based advertising. If you erase your cookies, reset your device identifier, or use different browsers or devices you may need to make your choices again.

Children

Our site is not intended for use by Children under the age of 13. We do not knowingly collect personal information from children under the age of 13 through the Site except as permitted by US law.

Data Security and Retention

We have implemented reasonable physical, technical and administrative security measures for the Site to help protect information we collect and store.

We retain other information such as customer contact and payment information in our systems for as long as necessary as permitted by law to comply with our legal obligations, resolve disputes, and enforce our agreements.

Specific Provisions for EU Individuals

If you are located in the European Union the following provisions apply to you.

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 necessary to do so for fraud prevention, improving our network and services, and marketing our services to advertisers and publishers; where these interests are not overridden by your data protection rights.

If the processing of personal data is necessary and there is no other lawful basis for such processing, we will generally ensure that consent has been obtained from you. You have the right to withdraw your consent to processing of personal data at any time.

For questions about data processing, please contact our Data Protection Officer. Visit the “Contact” section below for contact information.

Children

We do not knowingly collect personal information from children under the age of 16 through the Advertising Services and the Site.

Your Rights

If you are an individual in the EU, you may be entitled:

- 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.

All requests will be dealt with at the earliest opportunity. To exercise these rights, contact our data protection officer. See 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.

Policy Changes

We may, in our sole discretion, make changes to the Policy from time to time in order to accommodate new technologies, industry practices, regulatory requirements, or for other

purposes. The most recent version of the Policy will always be posted on the Site. If we do make any changes, we will also update the “Effective Date” posted at the top of the Policy. If we make any material changes we will notify you by email (sent to the email address specified in your account) or by means of a notice on the Site prior to the change becoming effective. We encourage you to review the Policy periodically to ensure that you understand how we collect, use and share information.

Any changes to the Policy will become effective when the revised Policy is posted on the Site. By continuing to use the Site or Services following such changes, you are agreeing to accept the terms of the revised Policy.

Contact Us

If you have any questions or comments about this Policy, please contact us at:

Data Protection Officer

Bat Technology CO., Limited

Flat 01C3, 10/F Carnival Commercial Building 18 JAVA RD North Point HK

You can also contact us via email at dataprotection@batmobi.net.

Please be sure to include your name, address and email address in any correspondence to us so that we can respond to your inquiry in a timely manner.