

Cleanplay, Inc. Privacy Policy
Last Updated: 10/01/2024

This Privacy Policy applies to the processing of personal information by Cleanplay, Inc. (“**Cleanplay**,” “**we**,” “**us**,” or “**our**”) including on our website available at Cleanplay.com and our other online or offline offerings which link to, or are otherwise subject to, this Privacy Policy (collectively, the “**Services**”).

Disclosure Regarding Customer Data. This Privacy Policy does not apply to the personal information that we process on behalf of our customers pursuant to a written agreement we have entered into with such customers (“**Customer Data**”). Our customers’ respective privacy notices or policies govern their collection and use of Customer Data. Our processing of Customer Data is governed by the contracts that we have in place with our customers, not this Privacy Policy. Any questions or requests relating to Customer Data should be directed to our customer.

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1. UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time in our sole discretion. If we do, we’ll let you know by posting the updated Privacy Policy on our website, and/or we may also send other communications.

2. PERSONAL INFORMATION WE COLLECT

We collect personal information that you provide to us, personal information we collect automatically when you use the Services, and personal information from third-party sources, as described below.

A. Personal Information You Provide to Us Directly

We may collect personal information that you provide to us.

- **Account Information.** We may collect personal information in connection with the creation or administration of your account. This personal information may include, but is not limited to, your name, email address, phone number, platform user ID, approximate geolocation, and other information you store with your account.
- **Purchases.** We may collect personal information and details associated with your purchases, including payment information.
- **Your Communications with Us.** We, and our service providers, may collect the information you communicate to us.
- **Surveys.** We may contact you to participate in surveys. If you decide to participate, we may collect personal information from you in connection with the survey.

- **Interactive Features.** We and others who use our Services may collect personal information that you submit or make available through our interactive features (e.g., messaging features, commenting functionalities, forums, blogs, and social media pages). Any information you provide using the public sharing features of the Services will be considered “public.”
- **Sweepstakes or Contests.** We may collect personal information you provide for any sweepstakes or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.
- **Conferences, Trade Shows, and Other Events.** We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships.** We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications.** If you apply for a job with us, we will collect any personal information you provide in connection with your application, such as your contact information and CV.

B. Personal Information Collected Automatically

We may collect personal information automatically when you use the Services.

- **Device Information.** We may collect personal information about your device, such as your Internet protocol (IP) address, user settings, cookie identifiers, other unique identifiers, browser or device information, Internet service provider, and location information (including, as applicable, approximate location derived from IP address).
- **Usage Information.** We may collect personal information about your use of the Services, such as the pages that you visit, items that you search for, the types of content you interact with, information about the links you click, the frequency and duration of your activities, and other information about how you use the Services.
- **Cookie Notice (and Other Technologies).** We, as well as third parties, may use cookies, pixel tags, and other technologies (“**Technologies**”) to automatically collect personal information through your use of the Services.
 - **Cookies.** Cookies are small text files stored in device browsers.
 - **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded in the Services that collects personal information about use of or engagement with the Services. The use of a pixel tag allows us to record, for example, that a user has visited, a particular web page or clicked on a particular advertisement. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

See [“Your Privacy Choices and Rights”](#) below to understand your choices regarding these Technologies.

C. Personal Information Collected from Third Parties

We may collect personal information about you from third parties. For example, if you access the Services using a Third-Party Service (defined below), we may collect personal information about you from that Third-Party Service that you have made available via your privacy settings. In addition, users of the Services may upload or otherwise provide personal information about others.

3. HOW WE USE PERSONAL INFORMATION

We use personal information for a variety of business purposes, including to provide the Services, for administrative purposes, and to provide you with marketing materials, as described below.

A. Provide the Services

We use personal information to fulfill our contract with you and provide the Services, such as:

- Managing your information;
- Providing access to certain areas, functionalities, and features of the Services;
- Answering requests for support and communicating with you;
- Sharing personal information with third parties as needed to provide the Services;
- Processing your financial information and other payment methods for products and Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use personal information for various administrative purposes, such as:

- Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Carrying out analytics, measuring interest and engagement in the Services;
- Improving, upgrading, or enhancing the Services;
- Developing new products and services;
- Creating de-identified and/or aggregated information. If we create or receive de-identified information, we will not attempt to reidentify such information, unless permitted by, or required to comply with, applicable laws;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this Privacy Policy;
- Debugging to identify and repair errors with the Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Enforcing our agreements and policies; and
- Carrying out activities that are required to comply with our legal obligations.

C. Marketing

We may use personal information to tailor and provide you with marketing and other content. We may provide you with these materials as permitted by applicable law. If you have any questions about our marketing practices, you may contact us at any time as set forth in "[Contact Us](#)" below.

D. With Your Consent or Direction

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information, with your consent, or as otherwise directed by you.

E. Automated Decision Making

We may engage in automated decision making, including profiling. Cleanplay's processing of your personal information will not result in a decision based solely on automated processing that has a legal or other similarly significant effect on you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated decision making. If you have questions about our automated decision making, you may contact us as set forth in "[Contact Us](#)" below.

4. HOW WE DISCLOSE PERSONAL INFORMATION

We disclose personal information to third parties for a variety of business purposes, including to provide the Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide the Services

We may disclose any of the personal information we collect to the categories of third parties described below.

- **Service Providers.** We may disclose personal information to third-party service providers that assist us with the provision of the Services. This may include, but is not limited to, service providers that provide us with hosting, customer service, analytics, marketing services, IT support, and related services.

Some of the service providers we may use include:

- **Google Analytics.** For more information about how Google uses your personal information, please visit [Google Analytics' Privacy Policy](#). To learn more about how to opt out of Google Analytics' use of your personal information, please click [here](#).
- **LinkedIn Analytics.** For more information about how LinkedIn uses your personal information, please visit [LinkedIn Analytics' Privacy Policy](#). To learn more about how to opt-out of LinkedIn's use of your information, please click [here](#).
- **Other Users You Share or Interact With.** The Services may allow Cleanplay users to share personal information or interact with other users of the Services.
- **Third-Party Services You Share or Interact With.** The Services may link to or allow you to interface, interact, share information with, direct us to share information with, access and/or use third-party websites, applications, services, products, and technology (each a "**Third-Party Service**"). Any personal information shared with a Third-Party Service will be subject to the Third-Party Service's privacy policy. We are not responsible for the processing of personal information by Third-Party Services.

- **Business Partners.** We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information with business partners with whom we jointly offer products or services.

Once your personal information is shared with our business partner, it will also be subject to our business partner's privacy policy. We are not responsible for the processing of personal information by our business partners.

- **Affiliates.** We may share your personal information with our corporate affiliates.
- **Advertising Partners.** We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Services to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as "interest-based advertising", "personalized advertising", or "targeted advertising."

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing, reorganization, bankruptcy, receivership, purchase or sale of assets, transition of service to another provider, or other similar corporate transaction, your personal information may be disclosed, sold, or transferred as part of such a transaction.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are described below.

- **Email Communications.** If you receive an unwanted email from us, you can use the unsubscribe functionality found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails. We may also send you certain non-promotional communications regarding us and the Services, and you will not be able to opt out of those communications (e.g., communications regarding the Services or updates to this Privacy Policy).
- **"Do Not Track."** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- **Cookies.** You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, the Services may not work properly.

Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of certain tracking on some mobile applications by following the instructions for [Android](#), [iOS](#), and [others](#).

The online advertising industry also provides mechanisms that may allow you to opt out of receiving targeted ads from organizations that participate in self-regulatory programs. To learn more, visit the [Network Advertising Initiative](#), [the Digital Advertising Alliance](#), and [the European Digital Advertising Alliance](#).

Please note you must separately opt out in each browser and on each device.

6. CHILDREN’S PERSONAL INFORMATION

The Services are not directed to children under 16 (or other age as required by local law outside the United States), and we do not knowingly collect personal information from children.

If you are a parent or guardian and believe your child has uploaded personal information to the Services in violation of applicable law, you may contact us as described in “[Contact Us](#)” below.

7. THIRD-PARTY WEBSITES/APPLICATIONS

The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

8. CONTACT US

Cleanplay is the controller of the personal information we process under this Privacy Policy.

If you have any questions about our privacy practices or this Privacy Policy, please contact us at: contact@cleanplay.com