

Privacy Policy

Effective date: Oct 8, 2024

Scope of this Privacy Policy

10Happy Inc is committed to protecting your privacy. This Privacy Policy explains how we handle data, including what we collect and how we obtain it, how we use it, when and if we disclose it.

BY INSTALLING THE APPS ON YOUR MOBILE DEVICE, ENTERING INTO, CONNECTING TO, ACCESSING AND/OR USING THE APPS, YOU AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY, INCLUDING TO THE POSSIBLE COLLECTION AND PROCESSING OF YOUR PERSONAL INFORMATION. PLEASE NOTE: IF YOU OR, AS APPLICABLE, YOUR LEGAL GUARDIAN, DISAGREE TO ANY TERM PROVIDED HEREIN, YOU MUST NOT INSTALL, ACCESS AND/OR USE THE APPS AND YOU ARE REQUESTED TO PROMPTLY ERASE ALL OUR APPS FROM YOUR MOBILE DEVICE.

If you are under the age of eighteen (18), please ensure that your legal guardian has reviewed and agreed to this Privacy Policy.

Offline Use

We allow an offline use (without Internet connection and without GPS enablement) of some features of our Apps. Offline use of Apps will preclude collection by us and/or Third Parties of any information pertaining to the User and its use of the Apps.

Who are we?

The words "we", "our", "us" refer to 10happy Technology Development (Dalian)Co.,Ltd.

Types of Data collected

There are two types of information which may be processed about Users of our Apps:

1 Non-personal Information.

Non-identifiable and anonymous information ("Non-personal Information") may be collected, stored and/or processed by us and/or third party providers of certain products and services, such as ad networks, analytics, etc. ("Third Party(ies)"). We and our Third Parties do not know the identity of the User from whom Non-personal Information has been collected. Non-personal Information is any information which is available to us and/or our Third Parties through use by Users of the Apps. Some jurisdictions consider this information to be personal information. Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Trackers; Usage Data.

2 Personal Information. Individually identifiable information (“Personal Information”). This information may identify an individual and/or may be of a private and/or sensitive nature.

the User’s persistent device identifier such as advertising identifier (IDFA, Advertising ID), randomly generated User ID and IP address. We keep IP addresses for 1 week for error logs and then delete them. We note that we may collect, use and provide access to the User’s advertising identifier in accordance with the applicable Platform Provider’s rules, policies and guidelines.

In addition, Third Parties may track and collect information regarding your on-line activities over time and across different online platforms (such as websites, applications, etc.).

We do not collect or process any financial or payment information, any government identification numbers, any non-public phonebook or contact information, any microphone and camera sensor data, or any sensitive device data concerning Users. In addition to the processing of information described in this policy, some of our Apps may also access Personal and Non-personal Information but without our apps carrying out any processing. In these cases, the App may access the information but it is not transmitted outside of your device and our apps does not collect or use it in any way. An App may access information in this way in order to provide functionality necessary for particular features of the App.

How is the Information about Our Users collected?

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Personal Information which you provide us directly and/or through Third Parties via your installation and/or use of our Apps or your behavior to ads inside such Apps. This information is collected via our Apps or such Third Parties’ APIs or SDKs embedded in our Apps. In addition, local Personal Information may also be stored on your device via generally accepted industry technologies used within our Apps, such as “cookies” and local storage.

Personal Data may be freely provided by the User, or, in case of Usage Data, collected automatically when using this Application.

Unless specified otherwise, all Data requested by this Application is mandatory and failure to provide this Data may make it impossible for this Application to provide its services. In cases where this Application specifically states that some Data is not mandatory, Users are free not to communicate this Data without consequences to the availability or the functioning of the Service.

Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

Any use of Cookies – or of other tracking tools – by this Application or by the

owners of third-party services used by this Application serves the purpose of providing the Service required by the User, in addition to any other purposes described in the present document.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application.

Sharing Information with other third parties

In addition to the sharing of Personal Information with Third Parties described in sections above, we may share Personal Information in the following cases:

1. to satisfy any applicable law, regulation, legal process, subpoena or governmental request;
2. to enforce this Privacy Policy and/or other of our terms or policies, including investigation of potential violations of such policies;
3. to detect, prevent, or otherwise address fraud, security or technical issues;
4. to respond to claims that any content published on the Apps violates any right of a third-party;
5. to protect the rights, property or personal safety of the Company, its Users, suppliers, licensors, licensees or the
6. when the Company undergoes any change of control, including by means of merger, acquisition or purchase of all or substantially all of the assets of Company, in which case your Personal Information may also be disclosed, transferred and/or assigned;
7. pursuant to your explicit approval prior to the disclosure;
8. as part of a competition, receiving rewards or otherwise interact with our social media channels.
9. for clarify, we may transfer and disclose Non-personal Information to third parties at our discretion.

Advertisements

We accept ads in various formats (such as banners, interstitial, rewarded videos, etc.) from Third Party ad networks which may be displayed in our Apps. These Third Party ad networks may collect and use:

- (i) information about your visits to our Apps in connection with such marketing, sales and advertising activities;
- (ii) geographic tracking and carrier network preferences;
- (iii) information, such as age, gender and other information logged from your device to ensure that appropriate advertising is presented within the App, to calculate or control the number of views of an ad, to deliver ads relating to User's interests and to measure the effectiveness of ad campaigns. The delivery of ads to you may be based on IP address, device identifiers and other Personal Information gathered during your use of our Apps. You may also be presented with contextual or non-targeted ads, i.e. ads which are not directed towards specific Users but are rather

broadly posted onto random Apps. If you chose to receive contextual or non-targeted ads only within our Apps, please be aware that you may still see some targeted ads served by third parties if you have separately (e.g. on that third party's website or app) agreed to personalized advertising directly to those third parties. Note that if you click on any of these ads, the advertisers may use cookies and other tracking technologies (such as tracking pixel agent or visitor identification technology, etc.) on your device to collect data regarding ad performance, your interaction with such ads and our Apps and your interests (which may include, non-personal and/or personal information such as, device and network information, unique identifiers, gender, age and geo-location about you) in order to serve you ads, including targeted ads, and for the legitimate business interests of such Third Parties ad networks. We recommend that you review the terms of use and privacy policy of any third party advertisers with whom you are interacting before doing so. Their privacy policy, not ours, will apply to any of those interactions.

This type of service allows User Data to be utilized for advertising communication purposes. These communications are displayed in the form of banners and other advertisements on this Application, possibly based on User interests.

This does not mean that all Personal Data are used for this purpose. Information and conditions of use are shown below.

Some of the services listed below may use Trackers to identify Users or they may use the behavioral retargeting technique, i.e. displaying ads tailored to the User's interests and behavior, including those detected outside this Application. For more information, please check the privacy policies of the relevant services.

Services of this kind usually offer the possibility to opt out of such tracking. In addition to any opt-out feature offered by any of the services below, Users may learn more on how to generally opt out of interest-based advertising within the dedicated section "How to opt-out of interest-based advertising" in this document.

Unity Ads (Unity Technologies ApS)

Unity Ads is an advertising service provided by Unity Technologies ApS.

Personal Data processed: Trackers; Usage Data.

Links to third party sites

Certain links provided in the Apps through ads or otherwise permit Users to leave our Apps and enter third party

sites, products or services. These linked sites, products and services are not under our control . Most of such linked

sites, products and services provide legal documents, including terms of use and privacy policies, governing the use

of these sites. It is always advisable to read such documents carefully before using those sites and services so that

you know what kind of information they are collecting.

The purposes of processing

The Data concerning the User is collected to allow the Owner to provide its Service, comply with its legal obligations, respond to enforcement requests, protect its rights and interests (or those of its Users or third parties), detect any malicious or fraudulent activity, as well as the following: Advertising.

For specific information about the Personal Data used for each purpose, the User may refer to the section “Detailed information on the processing of Personal Data”.

The rights of Users

The rights of Users based on the General Data Protection Regulation (GDPR)

Users may exercise certain rights regarding their Data processed by the Owner. In particular, Users have the right to do the following, to the extent permitted by law:

- **Withdraw their consent at any time.** Users have the right to withdraw consent where they have previously given their consent to the processing of their Personal Data.
- **Object to processing of their Data.** Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent.
- **Access their Data.** Users have the right to learn if Data is being processed by the Owner, obtain disclosure regarding certain aspects of the processing and obtain a copy of the Data undergoing processing.
- **Verify and seek rectification.** Users have the right to verify the accuracy of their Data and ask for it to be updated or corrected.
- **Restrict the processing of their Data.** Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.
- **Have their Personal Data deleted or otherwise removed.** Users have the right to obtain the erasure of their Data from the Owner.
- **Receive their Data and have it transferred to another controller.** Users have the right to receive their Data in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.
- **Lodge a complaint.** Users have the right to bring a claim before their competent data protection authority.

Security

Security of your information is very important to us. We take reasonable measures to maintain the security and integrity of our Apps and User information and prevent unauthorized access to it or use thereof through generally accepted industry standard technologies and internal procedures. Please note, however, that there are inherent risks in transmission of information over the Internet or other methods of electronic storage and we cannot guarantee that unauthorized access or use will never occur. TO THE FULLEST EXTENT PERMITTED BY LAW THE COMPANY SHALL NOT BE RESPONSIBLE OR LIABLE FOR UNAUTHORIZED DISCLOSURE OR ACCESS, HACKING, OR OTHER SECURITY INTRUSIONS OR THE THEFT, ALTERATION, DELETION, CORRUPTION, DESTRUCTION, DAMAGE, OR LOSS OF ANY DATA OR INFORMATION INCLUDED IN THE USER GENERATED CONTENT.

Further information about retention time

Unless specified otherwise in this document, Personal Data shall be processed and stored for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on the Users' consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between the Owner and the User shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of the Owner's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Owner within the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Owner may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

Changes to the Privacy Policy

The terms of this Privacy Policy will govern the use of the Apps and any information collected therein. We reserve the right to change this policy at any time, so please re-visit this page frequently to check for any changes. In

case of any material change, we will make reasonable efforts to post a clear notice on the Apps and/or our website

at

. Such material changes will take effect five (5) days after such notice was provided on

our App and/or Site, whichever is the earlier. Otherwise, all other Changes to this Privacy Policy are effective

as of the stated "Last Revised" and your continued use of the Apps on or after the Last Revised date will

constitute acceptance of, and agreement to be bound by, those changes.

Got any Questions?

If you have any questions (or comments) concerning this Privacy Policy, you are most welcome to send us an email

to the following address: help_10happy@hotmail.com. and we will make an effort to reply within a reasonable.