

KOALITIME APP PRIVACY POLICY ("PRIVACY POLICY")

IMPORTANT: BY DOWNLOADING, VISITING OR USING K.M.KOALITIME LTD.'S ("COMPANY" OR "WE") APPLICATION FOR SCREEN-TIME MANAGEMENT FOR CHILDREN AND ANY CONTENT OR SERVICE THEREIN ("APP"), YOU ("YOU") CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY AND CONSENT THAT ALL PERSONALLY IDENTIFIABLE INFORMATION THAT YOU SUBMIT OR THAT IS PROCESSED OR COLLECTED THROUGH THE APP, MAY BE PROCESSED BY THE COMPANY AND ITS AFFILIATES IN THE MANNER AND FOR THE PURPOSES DESCRIBED IN THE FOLLOWING PRIVACY POLICY.

WE DEFINE "PII" TO MEAN ANY INFORMATION RELATING TO AN IDENTIFIED OR IDENTIFIABLE NATURAL PERSON; AN IDENTIFIABLE NATURAL PERSON IS ONE WHO CAN BE IDENTIFIED, DIRECTLY OR INDIRECTLY, IN PARTICULAR BY REFERENCE TO AN IDENTIFIER SUCH AS A NAME, AN IDENTIFICATION NUMBER, LOCATION DATA, AN ONLINE IDENTIFIER OR TO ONE OR MORE FACTORS SPECIFIC TO THE PHYSICAL, PHYSIOLOGICAL, GENETIC, MENTAL, ECONOMIC, CULTURAL OR SOCIAL IDENTITY OF THAT NATURAL PERSON.

YOU ARE NOT LEGALLY REQUIRED TO PROVIDE US WITH PII, HOWEVER, USE OF THE APP REQUIRES YOU TO DO SO PURSUANT TO THIS PRIVACY POLICY. IN THESE CASES, IF YOU CHOOSE TO WITHHOLD ANY PII REQUESTED BY US, IT MAY NOT BE POSSIBLE FOR YOU TO USE THE APP OR ACCESS CERTAIN FEATURES OF THE APP. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS SET FORTH HEREIN PLEASE DO NOT USE THE APP.

We recognize that privacy is important. This Privacy Policy applies to all of the services, information, tools, features and functionality available on the App offered by the Company or its subsidiaries or affiliated companies and covers how PII that the Company collects and receives, including in respect of any use of the App, is treated. Note that the latest copies of the Privacy Policy and Terms of Use are available in Koalitime website – www.koalitime.com.

If you have any questions about this Privacy Policy, please feel free to contact us at: Office@Koalitime.com.

Please note, that a specific paragraph addressing Google Play Families Policy, User Data Policy, and Permissions Policy is included at the end of this document.

1. Information We Collect and How We Use It. In order to provide and improve our App and services, understanding trends, user preferences, in order to adjust and personalize use of the App or our services, marketing and customer relations purposes, we may collect and process PII, including the following types of information:

- 1.1. **Information You Provide.** If you register or use the App we may collect or ask you to provide PII, including: phone number, email address, child's age, country of residence and various field of optional information.
- 1.2. **Information Received from Third Parties.** We sometimes supplement the information that you provide with information that is received from third parties. If you access the App through any third party platforms, or interact with any third party platforms, we may receive information from your respective third party platforms account. This may include specific account information (such as user name, email, name, photo and any information defined as public pursuant to the policies of such third party platforms and/your settings in the respective third party platform. This may also include specific information regarding activities performed in the third party application, such as: completion of a specific task, performing a lesson, completing a test (including the test grade), etc.

This data shall be used for one of two purposes:

- User login, and user profile completion (for example - displaying the kid photo as provided in the google account on the parent interface).
 - Verifying the performance of specific tasks and/or reward system for completion of specific tasks, as part of enforcing the parental usage policy.
- 1.3. **User Communications.** When you send email or other communication to the Company, we may retain those communications in order to process your inquiries, respond to your requests and improve our App or services. When subscribing to Company's mailing lists on our websites or on the App we collect your e-mail address and country of your residence. We may send you news and updates in respect of the Website or our services. We may also send you newsletters and promotional communications, you may opt-out of this service, including participation in mailing list, at any time by submitting a request at the following email: *office@koalitime.com*. Please note that even if you opt-out of receiving the foregoing communications, we may still send you a response to any "Contact Us" request as well as administrative e-mails (e.g. in connection with password reset request) necessary to facilitate your use of the App.
- 1.4. **User Information.** When you or your child use the App, we may automatically receive and record information regarding your usage and information from your browser or device, including without limitation information and statistics about your online/offline status, impressions, your IP address, geo-location data, internet service provider, apps and pages visited, date and duration of the visit, type of browser or device, your regional and language settings and software and hardware attributes. Our systems may automatically record and store technical information regarding the method and nature of your use of the App. An IP address is a numeric code that identifies your browser or device on a network, or in this case, the Internet. Your IP address is also used to gather broad demographic information. The Company uses all of the PII that we collect to understand the usage trends and preferences of our users.
- 1.5. **Aggregate and Analytical Data.** In an ongoing effort to better understand and serve the users of the App, we often conduct research on demographics, interests and behavior of users (not on an individual basis), based on the PII and other information provided to us. This research may be compiled and analyzed on an aggregate basis, and we may share this aggregate data with our affiliates, agents and business partners. This aggregate information does not identify you personally. We may also disclose aggregated user statistics in order to describe our Services to current and prospective business partners, and to other third parties for other lawful purposes.
2. **Cookies.** In order to collect the data described herein we may use temporary cookies that remain on your browser or device for a limited period of time. We may also use persistent cookies that remain on your browser or device until removed, in order to manage and maintain the App and record your use of the App. Cookies by themselves cannot be used to discover the identity of the user. A cookie is a small piece of information which is sent to and stored on your browser. Cookies do not damage your browser or device. Most browsers and devices may allow you to block cookies but you may not be able to use some features on the App if you block them. You may set most browsers or devices to notify you if you receive a cookie (this enables you to decide if you want to accept it or not). We may also use web beacons via the App to collect information. Web beacons or "gifs", are electronic images that may be used on our App or in our emails. We use Web beacons to deliver cookies, count visits and to tell if an email has been opened and acted upon.
3. **Links.** Links to other websites, sites and applications may be provided by the Company as a convenience to our users. The Company is not responsible for the privacy practices or the content of other sites and applications and you visit them at your own risk. This Privacy Policy applies solely to PII collected by us.
4. **Children.** The App is designed to be installed by parents on their children's devices, for screen-time management and content suggestions. If you are not the child's parent or guardian, you must first obtain parental consent prior to installing or using our App. The Company will not knowingly allow installation by a person who is not the child's parent or legal guardian without said parental

consent. If you have reason to believe that a child has provided us with their PII without parental consent, please contact us at the address given above and we will endeavor to delete that PII from our databases.

5. **Information Sharing.** As part of providing the App or our services, our affiliates, agents and representatives may have access to your PII. We require these parties to process such information in compliance with this Privacy Policy and subject to security and other appropriate confidentiality safeguards. The Company may also share PII in the following circumstances: (a) as required for the provision, maintenance and improvement of the App or any service; (b) if we become involved in a reorganization, merger, consolidation, acquisition, or any form of sale of some or all of our assets, with any type of entity, whether public, private, foreign or local; (c) when permitted by you; (d) to ensure security and for purposes of debugging; (e) to our affiliates or other trusted businesses or persons, agents, third party service providers, subcontractors and representatives for the purpose of processing PII on our behalf in Israel and/or abroad; and/or (f) to satisfy applicable law or prevention of fraud or harm or to enforce applicable agreements and/or their terms, including investigation of potential violations thereof.
6. **Information Security.** We follow generally accepted industry standards to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of PII. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your PII, we cannot guarantee its absolute security. We retain your PII only for as long as reasonably necessary for the purposes for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.
7. **Data Integrity.** The Company processes PII only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service agreements. We review our data collection, storage and processing practices to ensure that we only collect, store and process the PII needed to provide or improve our App or services. We take reasonable steps to ensure that the PII we process is accurate, complete, and current, but we depend on our users to update or correct their PII whenever necessary. Nothing in this Privacy Policy is interpreted as an obligation to store information, and we may, at our own discretion, delete or avoid from recording and storing any and all information.
8. **Your Rights.**
 - 8.1. **Right of Access and Rectification.** You have the right to know what PII we collect about you and to ensure that such data is accurate and relevant for the purposes for which we collected it. We allow our users the option to access and obtain a copy of their PII and to rectify such PII if it is not accurate, complete or updated. However, we may first ask you to provide us certain credentials to permit us to identify your PII.
 - 8.2. **Right to Delete PII or Restrict Processing.** You have the right to delete your PII or restrict its processing. We may postpone or deny your request if your PII is in current use for the purposes for which it was collected or for other legitimate purposes such as compliance with legal obligations.
 - 8.3. **Right to Withdraw Consent.** You have the right to withdraw your consent to the processing of your PII. Exercising this right will not affect the lawfulness of processing your PII based on your consent before its withdrawal.
 - 8.4. **Right of Data Portability.** Where technically feasible, you have the right to ask to transfer your PII in accordance with your right to data portability.
You may exercise the above rights by sending a request to Office@Koalitime.com.
 - 8.5. **Right to Lodge Complaint.** You also have the right to lodge a complaint with a data protection supervisory authority regarding the processing of your PII.
9. **Enforcement.** The Company regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or our treatment of PII by

contacting us as provided above. When we receive formal written complaints, it is the Company's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of PII that cannot be resolved between the Company and an individual.

- 10. Changes to This Privacy Policy.** The Company may update this Privacy Policy. We will notify you about significant changes in the way we treat PII by sending a notice to the email address provided by you or by placing a prominent notice on the App or on our services. We encourage you to periodically review this Privacy Policy for the latest information about our privacy practices.
- 11. Consent to Processing.** By providing any PII to us pursuant to this Privacy Policy, all users, including, without limitation, users in the United States, Israel and member states of the European Union, fully understand and unambiguously consent to this Privacy Policy and to the collection and processing of such PII abroad. The server on which the App is hosted and/or through which the App is processed may be outside the country from which you access the App and may be outside your country of residence. Some of the uses and disclosures mentioned in this Privacy Policy may involve the transfer of your PII to various countries around the world that may have different levels of privacy protection than your country and may be transferred outside of the European Economic Area. If there is a transfer of your PII outside the EEA we will, in the absence of an EC Adequacy decision relevant to the destination country or to the transfer, seek to rely on appropriate safeguards such as entering into appropriate EC approved standard contractual clauses. By submitting your PII through the App, you consent, acknowledge, and agree that we may collect, use, transfer, and disclose your PII as described in this Privacy Policy.
- 12. Your California Privacy Rights and Do Not Track Notices.** California Civil Code Section 1798.83 permits customers of Company who are California residents to request certain information regarding its disclosure of PII to third parties for their direct marketing purposes. To make such a request, please send an email to *Office@Koalitime.com*. Please note that we are only required to respond to one request per customer each year.
- 13. Google Play Policies Compliance.** As noted above, specific care was taken with regards to compliance with Google policies, in particular Google Families Policy, User Data Policy, and Permissions Policy (as provided in the last document update date).
 - 13.1. Data Collection from Children.** As described in sections 1&4 above, the application is designed to be installed by parents on their children's devices, for screen-time management and content suggestions. Installation of the application by the parent is considered a consent for the collection of the data listed in section 1. Data which is not listed above is not collected by the app, in particular:
 - 13.1.1.** The application does not collect Location data, uses precise GPS location.
 - 13.1.2.** The application does not use the telephone camera/microphone.
 - 13.1.3.** The application does not make use nor does it require access to additional personal information, such as the photos gallery or contacts.
 - 13.1.4.** The application collects app usage data, in order to manage the phone screen time. This data is used to generate information and statistics about the phone usage for the parent, in particular in order to indicate positive usage over time.
 - 13.1.5.** The application does not currently display ads to children.
 - 13.1.6.** The application does not transmit Advertising IDs (AAID), including SIM Serial, Build Serial, BSSID, MAC, SSID, IMEI, and/or IMSI.
 - 13.1.7.** The application does not currently include social apps & features.
 - 13.1.8.** The application fully complies with Google Data Safety requirements.
 - 13.2. Google Families Policy.** Koalitime wishes to emphasize, that the application fully complies with COPPA (Children's Online Privacy Protection Act). Moreover, Koalitime does not

collect personal information from children without the explicit parental consent. The main topics are covered by section 4 above. In particular:

13.2.1. The application requires connectivity to a parent account in order to function. KoaliTime requires that a parent or guardian create the account and consent to any child data collection. We do not allow a child to create an account on their own.

13.2.2. The terms of use (section 6) specifically state that: "you must be 18+ or a parent/guardian to use this app for a child. Children should only use the application under parental supervision.

13.3. Google Permissions Policy. Please take a specific note, that Koalitime will monitor the applications as well as general device usage by the child in order to enforce the parental usage policy. For this purpose, Koalitime makes use of the Usage Access permission and Foreground Service permission. Koalitime is aware of the sensitive nature of these permissions, however these permissions are necessary and therefore justified by the nature of the application – to monitor and control screentime usage. Koalitime wishes to clarify:

13.3.1. The application directly monitors (tracks) the child app usage. This is a core mechanic and an essential component of the application.

13.3.2. The application runs a persistent background service on the device, which cannot be closed by the user. This is also an essential component of the application, required in order to ensure that the device usage is continuously monitored, as well as to enforce parental usage policy on the device. This also prevents manipulation of the device by the child, preventing him from circumventing the parental usage policy.

13.3.3. In addition, the application may access / receive data from third parties. As detailed in section 1.2 above, this data shall only be used in order to make existing data accessible to the parent, as part of enforcing the parental usage policy and/or providing usage analytics. This data shall be made available to the parent only. Any other uses by Koalitime shall be made only as general analytics to improve the application, without collecting and/or associating personal information with the data.

13.4. With regards to Information Sharing section (5), Koalitime wishes to clarify that any potential information sharing shall be minimized as possible in order to comply with the listed purposes. Koalitime shall not share any data unless necessary. In particular, Koalitime shall not share data for advertising purposes, or directly commercial purposes. Data shared with third parties shall only be shared with trusted service providers (such as for cloud storage, analytics, etc.).

13.5. With regards to deletion of user account data (as described in section 8.2 above), Koalitime wishes to clarify, that as such a request is expected to arrive from the parent, and as the current parent interface is web-based, it is currently not possible to submit a deletion request directly from the application. This however still complies with Google policies, as the usecase specifically calls for the request to arrive from the parent, which as explained currently makes use of web-based interface only.

13.6. As noted in section 10 above, should any new future application capabilities require changes to the above, Koalitime shall make sure that the new capabilities also comply with Google Policies, as well as update and request additional permissions from the parents (as applicable).