

Introduction

The iKeepSafe Privacy Program is available to operators and service providers of websites and online services, data management systems and other technologies that are, in whole or in part, intended for use in and of children, and which may collect, store, process or otherwise handle children's data.

This *iKeepProfile* is intended to assist you in determining whether PlayWorks complies with COPPA regulations. It indicates that PlayWorks has been assessed for alignment with the iKeepSafe COPPA Privacy Program Guidelines.

Product Overview

PlayWorks: <https://www.play.works>

Free Games by PlayWorks is a free to play games portal that offers a variety of over 50 casual games deployed on various CTV platforms such as Smart TVs, OTT devices and cable/satellite operators.

PW Kids is an AVOD app made of a collection of top YouTube creators including Eh Bee Family, Ninja Kidz TV and more! Deployed on various CTV platforms such as Smart TVs, OTT devices and cable/satellite operators.

Agreement

Children's Online Privacy Protection Act ("COPPA") (15 U.S.C §§ 6501- 6506)

1. PlayWorks contracts directly with schools and, as such, may rely on consent from the school instead of the parents for collection of personal information from students when data collected is for the use and benefit of the school, and not for any other commercial purposes. (N/A)
2. PlayWorks makes available clearly written policies explaining what data it collects from users, how such data is used, stored and to whom it may be disclosed.
3. PlayWorks makes available a copy of the privacy policy available to the school prior to completion of the sale, download or installation of the product. (N/A)
4. PlayWorks provides the school a description of the types of personal information collected; an opportunity to review the child's personal information and/or have the information deleted; and the opportunity to prevent further use or online collection of a child's personal information. (N/A)
5. PlayWorks collects limited data from or about children that is reasonably needed to provide users with a feature or activity, or to perform a valid business function that meets the strict definition of support for internal operations.
6. PlayWorks does not/will not condition a child's participation in an activity on the child disclosing more personal information than is reasonably necessary to participate in such activity.
7. PlayWorks maintains reasonable procedures to protect the confidentiality, security, and integrity of personal information collected from children. It takes reasonable steps to release children's personal information only to service providers and third parties who can maintain the confidentiality, security and integrity of such information, and who provide assurances that they will maintain the information in such a manner.
8. PlayWorks will retain personal information collected online from a child only as long as is reasonably necessary to fulfill the purpose for which the information was collected. It must delete such information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion.
9. PlayWorks will conduct annual training related to data privacy and security, including COPPA requirements, for all employees responsible in whole or in part for design, production, development, operations and marketing of their products. Such training will include all employees who are directly or peripherally involved in collection, use, storage, disclosure or any other handling of data.
10. PlayWorks will not make material changes to its privacy and security policies, including adding practices around new or additional data collection, or changes that may lessen the previously noted protections without prior notice to the parent. It will notify parents and obtain the prior verifiable consent for any material changes to its privacy policy that affect the collection or use of personal information from children.

Data Review Process

PlayWorks provides users direct access to any personally identifiable information that they provide to PlayWorks via product functionality. Users also have the ability to contact PlayWorks for access to all personal information on file by contacting PlayWorks through support@play.works

General inquiries related to privacy may be directed to:

Attention: Privacy Officer
PlayWorks Digital Limited
Audley House
12-12a Margaret Street
London, W1W 8RH
United Kingdom
Phone: +972 3769 1770

Security Protocols

PlayWorks has a comprehensive Security Program in place designed to protect the confidentiality, integrity and availability of systems, networks and data. The following is a general overview of data security protocols:

Data in Transit:

Data is transferred using HTTPS.

Data at Rest:

Data Center Security:

PlayWorks uses Amazon SSL certification for their service:

PlayWorks content is delivered through various servers and to multiple platforms such as; Comcast, Roku, Sky and Vizi which deliver HD and 4K video.

Personnel :

Background Checks: All employees with access to a child's data have undergone criminal background checks.

Training: Employees of PlayWorks will receive annual privacy and security training that includes COPPA.

Access: Access to a child's data is role-based; limited to those employees who need access to perform job responsibilities.

Employees are given access to the minimum services that are required for their job function.

Data Breach

In the event of an unauthorized disclosure of a Child's PI, PlayWorks will promptly notify users unless specifically directed not to provide such notification by law enforcement officials.

Notification shall identify:

- a. the date and nature of the unauthorized use or disclosure;
- b. the Private Data used or disclosed;
- c. general description of what occurred including who made the unauthorized use or received the unauthorized disclosure;
- d. what PlayWorks has done or shall do to mitigate any effect of the unauthorized use or disclosure;
- e. advice to the impacted user on how they can best protect themselves.
- f. what corrective action PlayWorks has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at PlayWorks the user can contact. PlayWorks will keep the user fully informed until the incident is resolved.

PlayWorks will notify impacted user (s) within 72 hours upon the discovery of a breach of security that results in the unauthorized release, disclosure or acquisition of any child data.

Data Deletion

PlayWorks states they do not collect any personal information as defined by the COPPA Rule from children under the age of 13 except for the use of persistent identifiers for internal operations.

These persistent identifiers are (a) your **IP address** and (b) **UA known as the User Agent**, all of which allows them to provide advertising content through their third-party advertising partners.

Research

PlayWorks uses Google Analytics (GA) to track user interaction. They use this data to determine the number of people using the platform, to better understand how they find and use their products.

Although Google Analytics may record data such as your IP Address, device type, internet browser and operating system, none of this information personally identifies you to them.

Third Parties

PlayWorks does not sell, trade, lease or loan the personal information they collect or maintain, in the course of providing the service, to any third party for any reason, including direct marketers, advertisers, or data brokers.

PlayWorks contracts with other third-party companies to perform business functions or services on their behalf and may share PII with such third parties as required to perform their functions. PlayWorks has agreements in place with all third parties with access to student personal information to ensure they only use the information for purposes necessary to deliver the authorized service and to ensure they maintain the confidentiality and security of the information. The agreements align with PlayWorks' data privacy and security policies and expectations.

PlayWorks utilizes the following third-party vendors:

Third Party	Purpose	Information Shared
Google Analytics	Analytics	Aggregated usage behavior
AWS CDN service	Web application hosting	Hosting
Vimeo	Video content hosting	Hosting

Product Data List

Regarding PlayWorks:

Playworks does NOT collect any personal information except for the use of internal operations which is the user's IP address and User Agent.

The child has the option to enter a screen name in several of the Free Games, however, the screen name, as well as Game Score History are only stored on a local device.

Accuracy Statement

PlayWorks Digital LTD. hereby confirms the accuracy and truthfulness of all information contained in the PlayWorks profile and has authorized iKeepSafe to make the profile available to any interested parties.

Signed and agreed:



(Signature)

Jonathan Boltax
CEO

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01/27/2021

The PlayWorks service has been reviewed and found in alignment with iKeepSafe's COPPA Privacy Program Guidelines as indicated by this product profile. PlayWorks has been awarded the iKeepSafe COPPA badge.

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

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