



iKeepSafe Product Profile
TickTalk Tech LLC
TickTalk App and SmartWatches

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 by schools, and which may collect, store, process or otherwise handle student data.

This *iKeepProfile* is intended to assist you in determining whether TickTalk Tech LLC, specifically the **TickTalk Parental Control App and Smartwatches**, complies with COPPA. It indicates that TickTalk Tech LLC has been assessed for alignment with the iKeepSafe COPPA Privacy Program Guidelines.

Product Overview

TickTalk is a smartwatch phone designed for children ages 5-12. Designed by two parents, TickTalk gives children a safe cell phone alternative with all the positives of a smartphone with no internet, games, or social media. TickTalk comes with a corresponding parental control app to give parents peace of mind with location tracking, 20+ parental controls, approving their child's contacts, and more.

<https://www.myticktalk.com/>

Agreement

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

1. TickTalk Tech LLC 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.
2. TickTalk Tech LLC makes a copy of the privacy policy available prior to completion of the sale, download or installation of the product.
3. TickTalk Tech LLC provides 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.
4. TickTalk Tech LLC 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.
5. TickTalk Tech LLC 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.
6. TickTalk Tech LLC maintains reasonable procedures to protect the confidentiality, security, and integrity of personal information collected. 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.
7. TickTalk Tech LLC 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 will delete such information using reasonable measures to protect against unauthorized access to, or use of, the information in connection with its deletion.
8. TickTalk Tech LLC 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.
9. TickTalk Tech LLC 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.

Security Protocols

The following is a general overview of data security protocols of TickTalk Tech LLC:

Data in Transit:

All data is transmitted over HTTPS.

Data at Rest:

Data at rest is encrypted using AES 256-bit encryption

Data Center Security:

TickTalk Tech LLC utilizes data centers operated by AWS. Data backups are stored on AWS S3 with secure bucket and AWS encryption. AWS comes with a public and private key authentication to access the cloud server running the platform and storing the data and the data backups.

[https://aws.amazon.comCloud Computing Services - Amazon Web Services \(AWS\)/compliance/iso-27001-faqs/](https://aws.amazon.comCloud%20Computing%20Services%20-%20Amazon%20Web%20Services%20(AWS)/compliance/iso-27001-faqs/)

<https://aws.amazon.com/compliance/data-privacy-faq/>

Personnel:

Training: TickTalk Tech LLC conducts privacy and security training for all employees.

Access: Access to children's data is limited to those employees who need access to perform job responsibilities. All employees with access to Children's PII have undergone background checks.

Data Deletion

TickTalk App and Smartwatches store your Personal Information for as long as it is necessary to provide their Devices and Services to you. Personal Information associated with the account will be kept until the account is deleted. They perform an annual audit of Personal Information and will remove all Child Personal Information including Historical Locations for Child Accounts that are inactive and/or have not been deactivated.

Please note they may have to retain some information after the account is closed, to comply with legal

obligations, to protect the safety and security of our community or our Service, or to prevent abuse of our Terms. A user, of course, can delete the account at any time, as per the “Deleting Your Account” section in the Privacy Policy.

Access to Audit

Once per year, TickTalk Tech LLC will provide parents with:

audit rights to their child’s data

access to the results of TickTalk Tech LLC or its third-party security audit

Data Breach

In the event of an unauthorized disclosure of a child’s records, TickTalk Tech LLC 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 TickTalk Tech LLC 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 TickTalk Tech LLC has taken or shall take to prevent future similar unauthorized use or disclosure; and
- g. who at TickTalk Tech LLC the user can contact. TickTalk Tech LLC will keep the user fully informed until the incident is resolved.

TickTalk Tech LLC 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 student information.

Data Review Process

TickTalk Tech LLC provides users direct access to the personally identifiable information that they provide to TickTalk Tech LLC through product functionality.

Registered Users may access or modify their personal information provided to TickTalk Tech LLC which is associated with the user account at any time. Users can log in to TickTalk App account and visit their account settings page or email us at support@myticktalk.com to exercise their rights at any time.

If the user has registered for a Child Account on the TickTalk App, the user may view, edit, or delete any of your profile information or your preferences at any time by logging into the TickTalk App account and accessing the account settings page. The user can also perform a System Reset locally on the Child's TickTalk Device or through the TickTalk App Settings to wipe the Child's TickTalk Device to factory settings, removing all Personal Information.

General inquiries related to privacy may be directed to:

Email: support@myticktalk.com

Phone: 1-(844)-260-4051

Mailing Address:

TickTalk Tech LLC
ATTN: Privacy Policy
565 West Lambert Road, Unit B
Brea, CA 92821

Research

TickTalk Tech LLC stated; We use none of the customer data for research or statistical purposes at this time. If data is used for behavioral or product improvements the data is aggregated and cannot be identified to any particular individual.

TickTalk Tech LLC may also analyze information that does not contain "Personal Information" (or contains "Personal Information" in anonymous or aggregated form) for trends and statistics, such as through the use of Google Analytics or other similar analytics services.

TickTalk Tech LLC does not use end user data in any non-production environments including testing, development and training. TickTalk Tech LLC does not use end user data for production improvement or research unless the data has been de-identified. TickTalk Tech LLC will only access non-aggregated

personal information for troubleshooting purposes with direct consent and permission from the parent or guardian.

Third Parties

TickTalk Tech LLC 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.

TickTalk Tech LLC 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. TickTalk Tech LLC has agreements in place with all third parties with access to child 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 TickTalk Tech LLC' data privacy and security policies and expectations.

[Amazon Web Services \(AWS\)](#) provides TickTalk with servers, databases, analytics, and network infrastructure. All child and parent/guardian personal information, data, device IDs, and requests/logs are stored on AWS.

Information Shared: All personal information goes through end-to-end encryption prior to transmission and is not accessible or viewable to AWS.

Red Pocket is a U.S. prepaid cellular provider. While TickTalk is not affiliated with any specific wireless carrier, we do include a free Red Pocket SIM kit with every U.S. purchase. If Parents and/or Guardians choose a Red Pocket SIM card at checkout, they will be prompted to create an account with Red Pocket directly to activate their SIM card and select a monthly plan. Red Pocket only has access to the information necessary to provide the cellular service, similar to your cellular provider on your personal cell phone.

Information Shared: Child's Phone Number, Parent Billing Name & Address, Parent Email, Parent Payment Information, Device IMEI Identifying Number, Device Data Usage, Voice Call Log at Network Level (including Call Duration, Other Party Number and Time Stamps for Billing Purposes), SMS Text Log at Network Level (including Other Party Number and Time Stamps for Billing Purposes)

*TickTalk Devices cannot receive SMS text messages, but Red Pocket can view logs of SMS requests to the Red Pocket phone number

Google Cloud provides TickTalk Google's API for Maps to convert device location to latitude and longitude.

Information Shared: Google's API is integrated into the TickTalk Tech LLC backend for precise location services. Google cannot view any location information for Children and/or Customers (Age 18+). TickTalk Tech LLC does not store any Child Personal Information in the Google Cloud service.

Google Workspace is used for TickTalk's internal operation communications, documents, spreadsheets, PowerPoints, etc.

Information Shared: TickTalk Tech LLC may share personal information with Google in the course of utilizing Google services, for example if a Parent/Guardian emails employees for support. TickTalk Tech LLC does not store any Child Personal Information in the Google service.

Zendesk provides TickTalk with its Customer Service platform for responding to Support requests.

Information Shared: TickTalk Tech LLC relies on Zendesk for Customer Service needs including but not limited to Device troubleshooting, support issues, refund and/or return requests, warranty inquiries, with Customers (Age 18+). TickTalk Tech LLC can collect Customers (Age 18+) name, email address, phone number, and/or Device Identifiers including IMEI numbers which would then be on the Zendesk platform. TickTalk Tech LLC does not store any Child Personal Information in the Zendesk service unless a Parent and/or Guardian has disclosed during the course of a Customer Service interaction.

Product Data List

Data Collection by TickTalk Tech LLC:

TickTalk App User Only (Non-Watch User)

Name and/or Nickname
Email Address and/or Phone Number which will be used as the login method
Password (We do not have access to this information)
Date of Birth to trigger parental consent methods

Relationship to your Child or TickTalk Device User

Parent's Email Address for Parental Consent before using the TickTalk App

Full Access User (Watch User):

Name

Profile Picture and/or Avatar

Phone Number

Birth Date (Optional)

Gender (Optional)

Precise Location

Past Precise Locations (if History Route is enabled)

Message Content with the Admin User

Group Chat Content (if the Admin User is included in that Group Chat conversation)

Device Call Logs

Reminders

Parent-Approved App Users ("Contacts") and Phone Book Contacts

Blocked Watch SMS Text Log

Activity Tracker and Daily Step Goals

Device and/or App Settings

Device Information including:

Date and/or Time of Device Activation

TTID Device Identifier

IMEI Device Identifier

Device Time Import if Parent and/or Guardian enlisted TickTalk Tech LLC's assistance in manually importing and/or activating Device information

Precise Device Location including:

Last Locating Date and Time

Last Activity Date and Time

Latitude and Longitude of Device

Locating Type (Wi-Fi, GPS, or LBS)

LBS Provider (Cell Tower Provider)

Device Status including:

Cellular Carrier APN

Device tOS (Operating System) Version

Device Information including MC, MNC, Network Type, Resolution, Available Capacity, Total

Capacity, etc.

Accuracy Statement

TickTalk Tech LLC hereby confirms the accuracy and truthfulness of all information contained in the TickTalk Tech LLC Product profile, and has authorized iKeepSafe to make the profile available to any interested third parties.

Signed and agreed:

DocuSigned by:
Vivian Gong
EA14D5E98172415...

(Signature)

Vivian Gong
President & Co-Founder

TickTalk Tech LLC
565 West Lambert Road
Unit B
Brea, CA 92821
T: 714.578.6719
vivian@myticktalk.com

06/20/2022

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

DocuSigned by:
Amber Lindsay
4936610B3823488...

(Signature)

Amber Lindsay
President & CEO
iKeepSafe

06/20/2022

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