



Privacy Policy



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1. GENERAL PROVISIONS

- 1.1. This Privacy Policy describes the information collected by Applied Systems Ltd. (hereafter referred as “we,” “us” or “our”) through our mobile applications and website, ways of collecting and using such information, protecting it from unauthorized access, terms of sharing and disclosure.
- 1.2. Our website (www.puppetlife.com) is intended for use by parents including young children with parental participation and supervision.
- 1.3. Our website and apps may contain information or links to other apps by Applied Systems. In this case, links are child-locked.
- 1.4. Our website and apps contain a child-locked Parents Zone, which may include links to App Store or Google Play, our website, our social media pages as well as contact links.
- 1.5. YOU ACCEPT THE TERMS OF THIS PRIVACY POLICY, OR IF YOU HAVE NOT REACHED THE AGE OF MAJORITY IN YOUR JURISDICTION, A PARENT OR LEGAL GUARDIAN MUST READ AND ACCEPT IT ON YOUR BEHALF.
- 1.6. IF YOU, OR YOUR PARENT/GUARDIAN ON YOUR BEHALF, DO NOT WISH TO BE BOUND BY THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT DOWNLOAD, ACCESS OR USE OUR WEBSITE OR MOBILE APPLICATIONS.
- 1.7. If you have questions about this Policy, please, contact us at info@appsys.net

2. PERSONAL AND NON-PERSONAL DATA

- 2.1. We take user trust seriously and recognize the importance of privacy concerns especially in the digital environment. With this in mind, we have adopted this Privacy Policy for apps by Applied Systems Ltd.
- 2.2. On our website and apps, we collect personal information in **two forms**.
One form is information that we expressly request you to provide in connection with certain activities (personal information).
The second form is anonymous information that we automatically collect from your computer, phone or other device.
- 2.3. Our Privacy Policy is based on the following principles:
 - 2.3.1. You are free to choose whether or not to engage in any activity on our web-site and apps that involves your submission of personal information.
 - 2.3.2. We use the anonymous information that is automatically collected from users’ devices.
 - 2.3.3. Third parties that we use to assist with the web-site and apps are required to follow this Privacy Policy.

3. COLLECTION OF PERSONAL DATA

- 3.1. Users need not register to visit our home page and access information about the company and its products. Some specific pages may require the provision of personal contact data (such as user name and email address).
- 3.2. In accordance with the Law of Republic of Belarus «On information, informatization and information protection» from 10.11.2008 №455-3, we provide the opportunity for you to opt out of certain types of usage of your personal data when supplied to us via registration forms. Should you wish your personal data to be removed from our records or updated at a later date, you can request this by emailing us.
- 3.3. We request the following information on our website: user name, , e-mail address or other information that can be used to identify or contact an individual, whether online or offline. We will ask you for such information expressly. Most of the activities on our web-site do not require you to submit any personal information.
- 3.4. A user may make personal data available to us in such cases:
 - i. when a parent subscribes to a newsletter;
 - ii. when a user requests technical support;
 - iii. otherwise through use of our apps and website where personal data is required for use and/or participation.The types of personal data collected may vary depending on the type of activity the user is engaged in.
- 3.5. We will obtain consent from a parent or a legal guardian before asking for personal information, unless the request for information falls within an exception that would be permitted under the corresponding legislation (including the Law of Republic of Belarus «On information, informatization and information protection» from 10.11.2008 №455-3; Resolution of Interparliamentary Assembly of the CIS Member Nations 03.12.2009 №33-15 on the Model Act «Children’s Protection against Harmful Information»; The Children’s Online Privacy Protection Act («COPPA»)). We will explain how we will use the information we obtained from our users.

- 3.6. Under Section 312(c)(3) of the COPPA rules effective July 1, 2013 we will send a notification email to the parent or the legal guardian and give the option to accept or decline the newsletter. If the newsletter is declined, we will not send the newsletter and will delete from our files any related personal information collected in the sign-up process. If the newsletter is not declined, we will send the newsletter. All newsletters contain instructions so that the recipient may unsubscribe at any time.
- 3.7. We use support information only for the support for the internal operations of our website and apps as provided under Section 312.2 of the COPPA rules effective July 1, 2013. We don't rent or sell your email address.
- 3.8. Any data gathered through our web site and apps is used for internal purposes only. This data is not shared with other organisations without users' permission.

4. PRIVACY PRINCIPLES FOR CHILDREN UNDER 13

- 4.1. Our website and mobile applications comply with online privacy protection legislation.
- 4.2. Our collection of personal information is intended to follow the principles of the Children's Online Privacy Protection Act ("COPPA"), a U.S. law designed to protect the online privacy of children under the age of 13, and the principles of the Resolution of Interparliamentary Assembly of the CIS Member Nations 03.12.2009 №33-15 on the Model Act «Children's Protection against Harmful Information».
- 4.3. We don't knowingly collect personal information from children under the age of 13, and if in the event that a user identifies himself or herself as a child under the age of 13 through a support request, we will not collect, store or use, and will delete in a secure manner, any personal information of such user.
- 4.4. We do not make personal information collected from users publicly available.
- 4.5. Parents may contact us to review, update or delete any of their children's personal information that we may have collected and to elect for us not to collect any additional personal information from their children.
- 4.6. When you request support, you may send us an email or contact us via our support page on our website.

5. COLLECTION OF NON-PERSONAL DATA

- 5.1. We use the anonymous information that is automatically collected from your device, such as a computer's Internet Protocol address, a mobile device identifier, operating system, to support internal operations so that we can understand and monitor the usage and improve the performance of our web-site and apps.
- 5.2. We may use third party analytics services such as Google Analytics, Flurry, Localytics, AppsFlyer, to collect and use certain data including, but not limited to:
 - i. (device properties, including, but not limited to IP address, Media Access Control ("MAC") address and unique device identifier or other persistent or non-persistent device identifier ("Device ID");
 - ii. device software platform and firmware;
 - iii. mobile phone carrier;
 - iv. progress, time used playing;
 - v. other non-personal data as reasonably required to enhance the service and other products and services.
- 5.3. We use the anonymous information that is automatically collected to support the internal operations of the web site and apps. Internal operations include the following:
 - i. to monitor metrics such as total number of visitors and traffic;
 - ii. to understand which activities and services are most popular;
 - iii. to understand the pages where visitors enter our site and the pages viewed;
 - iv. to recognize the browsers used to visit our web site, so that the content is adapted for the relevant browser; and
 - v. to diagnose and fix technology problems.

6. COOKIES

- 6.1. When you visit our website, we may send cookies to your computer that uniquely identify your browser. We use cookies to improve the quality of our service by storing user preferences and tracking usage information.
- 6.2. A "cookie" is a piece of information that a web site or an app transfers to a user's device for record-keeping purposes. As a user moves from one page or one screen to another, a cookie is used to tell us that it is the same device. We also may use a cookie to keep track of your selections. You may set your device to accept or not accept cookies and you may delete any cookies that you have received.

However, should you decide to disable any cookies we place on your device, you may not be able to use certain services or features on our web-site or apps.

- 6.3. Applied Systems Ltd. cookies do not include personal data and are typically used to quickly identify a user's device and to "remember" the user.
- 6.4. A "web beacon" or a "pixel tag" is an electronic image that allows us to count users who have visited certain pages. Web beacons, like cookies, do not include personal data. E-mails and other electronic communications sent to a user may contain pixel tags that enable us to track a user's usage of the communication, including whether the communication was opened and/or what links were followed, if any.

7. DATA RETENTION

- 7.1. We retain the data collected pursuant to this Privacy Policy for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Thereafter if the collected data is no longer needed for purposes specified in this Privacy Policy, we delete all aforementioned data in its possession within a reasonable timeframe.
- 7.2. Your information collected through a web-site or an app may be stored and processed in Republic of Belarus or any other country in which we or our service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from Belarusian law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction. By using a web-site or an app you consent to the transfer of information to any other country in which we or our service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

8. DISCLOSURE OF DATA

- 8.1. We may use personal and non-personal data, and disclose personal and non-personal data, in accordance with applicable legislation and this Privacy Policy.
- 8.2. We may disclose personal and non-personal data to our partners and contractors for purposes of analyzing usage of our apps and web-site, providing customer and technical support, managing and providing other services. We share this information in an aggregated and anonymized manner such that will not in any way identify a user.
- 8.3. We may use a parent's personal data provided in the parent section to send messages to the parent with informative and/or commercial content about our services or third party products and services we think may be of interest to you, such as new features and services, special offers and updated information. In addition, if a User has agreed to receive push notifications, and appropriate consent to receive them has been given, we will use the data collected and share it with its vendors for the purpose of delivering approved push notifications.
- 8.4. If a user contacts us by email, we will use the personally identifiable email address information only to respond to the specific inquiry.
- 8.5. From time to time, we may hire agents and contractors to collect and process personal data on our behalf and in such cases such agents and contractors will be instructed to comply with our Privacy Policy and to use personal data only for the purposes for which the third party has been engaged by us. These agents and contractors may not use a user's personal data for their own marketing purposes. We may use third party service providers such as credit card processors, e-mail service providers, shipping agents, data analyzers and business intelligence providers. We have the right to share users' personal data as necessary for the aforementioned third parties to provide their services for us. Applied Systems Ltd. is not liable for the acts and omissions of these third parties, except as required by law.
- 8.6. We may share your email address and/or support information:
 - i. to protect the security or integrity of our website and apps,
 - ii. to take precautions against liability;
 - iii. to respond to judicial process, or
 - iv. to the extent permitted under other provisions of law, to provide information to law enforcement agencies or for an investigation on a matter related to public safety; and where such information is not used for any other purpose, all in compliance with Section 312.5(c)(6) of the COPPA rules effective July 1, 2013.
- 8.7. We may access, preserve and share your information when we have a good faith belief that it is necessary to: (i) respond to a legal request (like a search warrant, court order or subpoena) or otherwise to take action because we believe it is required or advisable under the law; (ii) detect, prevent and address fraud and other illegal activity; (iii) respond to your requests for customer service; or (iv) limit our legal liability or to protect the rights, property, or personal safety of ourselves, any user of our web-site and apps, a third party or the general public including as part of investigations.

- 8.8. Business Transfer. If we sell or otherwise transfer part or the whole of our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your personal information, and any other information collected through our web-site and apps may be among the items sold or transferred. The buyer or transferee will be required to honor the commitments we have made in this Privacy Policy.

9. USER CONSENT TO THIS PRIVACY POLICY

- 9.1. By using our web site and apps, you consent to the collection and use of your data as specified above. Your visit and any dispute over privacy are subject to this Policy.
- 9.2. The Privacy Policy detailed herein applies to any and all information that a user may have obtained from or provided to Applied Systems Ltd. We reserve the right, at its full and complete discretion and without prior notice, to change, modify, amend, add, subtract, or otherwise remove portions of its Privacy Policy at any time and for any or no reason. We may email users a copy of the revised Privacy Policy at the email address.
- 9.3. Please, periodically continue to check the Privacy Policy at www.puppetlife.com for any changes. A user's use of the service after the posting of any amendments, deletions or other changes to the Privacy Policy will constitute acceptance, acknowledgment and agreement to the respective changes. If any such modification requires us to provide notice to a parent or receive parental consent, we will take the steps necessary to comply with those requirements at that time.
- 9.4. We follow generally accepted industry standards and maintain reasonable safeguards to attempt to ensure the security, integrity and privacy of the information in Applied Systems' Ltd. possession. Only those persons with a need to process Users' personal data in connection with the fulfillment of their tasks in accordance with the purposes of this Privacy Policy and for the purposes of performing technical maintenance, have access to Users' personal data in Applied Systems' Ltd. possession. Personal data collected by Applied Systems is stored in secure operating environments that are not available to the public. To prevent unauthorized on-line access to personal data, Applied Systems Ltd maintains data within a fire-wall protected environment. However we cannot and do not guarantee the security of materials or information transmitted to us or other users over the Internet or wirelessly. Applied Systems does not accept liability for any unintentional disclosure.
- 9.5. Applied Systems makes good faith efforts to enable users to review, update or correct any personal data in our possession. Users should contact us at info@appsys.net. We will need sufficient information from the user to establish the user's identity and to verify the user's access, and also to assist in handling the user's request. Even if personal data is changed or deleted according to a user request, we may still retain some of User personal data to resolve disputes, enforce user agreement(s), and comply with technical and legal requirements and constraints related to the integrity, security and operation of Applied Systems' Ltd. services.

This privacy policy was last updated on July 30th 2014.