# PRIVACY POLICY

Last Updated on June. 2022

This Privacy Policy ("Policy") is subject to any service agreement between Ignie media ("We") and you. By using the Ignite media Service or Ignite media Site, you acknowledge that you have read, understood and agreed to this Privacy Policy. Please review this Privacy Policy before using the Ignite Media Service or the Ignite Media Site.

This Policy covers Ignite Media's handling of two types of information:

- (1) Information we receive about end users of third-party mobile applications ("Apps") that use our Software Development Kit ("SDK"), Application Programming Interface ("API"), any platform, services or technologies provided by Ignite Media (collectively, the "Ignite Media Services"), information we receive about users that use Ignite Media Services (Collectively "User" or "you"), and information we receive about Users while Users interact with platforms, applications, websites or other services provided by Ignite Media's business partners (e.g. app publisher, advertiser);
- (2) Information we receive through our website at <a href="www.ignitemediatech.com">www.ignitemediatech.com</a> or any other website on which this Policy is posted, as well as information we get through other corporate services and web portals we make available to clients and business partners ("Ignite Media Sites", "Website", "Site") from Ignite Media Website visitors ("Visitors" or "you").

We evaluate this Policy and procedures to implement improvements and refinements from time to time. If we make material changes to this Policy we will notify you by means of a prominent notice on Ignite Media Site prior to the change becoming effective.

Data protection and ensuring our business partners' and your trust is at the core of Ignite Media's business principles. Accordingly, being compliance with applicable data protection laws is our top priority and this Policy is updated to be compliance with the applicable data protection laws, including EU General Data Protection Regulation ("GDPR"), the Children's Online Privacy Protection Act ("COPPA"), the California Customer Privacy Act ("CCPA") and the Brazilian General Data Protection Law (Lei Geral de Proteção de Dados Pessoais) ("LGPD").

Our Policy will be subject to the applicable laws and regulations of the relevant country. Please refer to the Policy of your country, as our policies may differ for some countries and regions.

## GENERAL TERMS

## U.S. TERMS

## EEA & Switzerland

## GENERAL TERMS

#### INTRODUCTION

This Privacy Policy describes the information that Ignite Media collects from visitors to and users or any mobile application in relation to the Website and how we use it, how we protect it and your rights to:

- (1) view ads served by the Ignite Media Services;
- (2) interact with the Ignite Media Services; or
- (3) interact with platforms, applications, websites or other services provided by Ignite Media's business partners (e.g. app publisher, advertiser).

Our technology enables our partners to show Users more relevant advertising that is based on Users' interests and behaviors. In order to provide Ignite Media Services, we may collect and use certain information about User activity and preferences. We understand how important it is to keep such User's personal information confidential and discrete, especially in today's online world. To this end, we have designed this Policy in a format that is easy to navigate and read so that our privacy practices can be clearly understood.

The Ignite Media Services may link to third party websites, Apps or other third party content. Please note that we cannot control the treatment of a User's information by such third parties, and that the privacy practices of third parties likely differ from those described in this Policy.

## HOW WE COLLECT YOUR INFORMATION

Depending on the nature of a User's interaction with the Ignite Media Services, or any service provided by Ignite Media's business partners, we may collect information directly from such User or from our business partners (e.g. mobile application developers, Ad Exchange platforms, and advertisers). For example, when we partner with an Ad Exchange platform and the Ad Exchange platform initiates an ad request to our DSP, it may share User's information with us.

We collect your information on the following grounds:

- (1) We need to process such information to deliver contractual services to you.
- (2) You consent to provide us when you create an account and use Ignite Media Services.
- (3) We collect when we believe it is for our legitimate interests in order to provide

- you better experiences with Ignite Media Services.
- (4) We collect to serve interest-based ads by building profile about Users.
- (5) We collect for monitoring traffic and measuring the performance and effectiveness of ads including preventing any fraud;
- (6) We need to understanf and analyze Users' usage trends and preferences; and
- (7) We collect for ensuring the safety and security of process and system.

When we collect information about our partners' business representatives such as name and email address, our purpose is to contact them for business communication including necessary communication for purpose of performing the agreements with our partners.

We and/or our business partners may collect and/or process the following User information only as necessary to deliver contractual services as illustrated in the Ignite Media Partner agreement to you:

device make, device model, operating system (e.g. iOS) and the OS version of the device, device type (e.g. smartphone, tablet, etc.), screen size, orientation and battery, carrier information, version and characteristic of the app used by you when you interact with Ignite Media's Service, country, time zone and locale settings (country and preferred language), network connection type, IP address, SDK version, timestamp, network status such as WiFi, mobile advertising identifier (e.g. Apple IDFA or Google advertising ID), device event information such as crashes, system activity, hardware settings, the date and time of your request and referral URL, user-agent, package name of the app of Ignite Media's business partners, IDFV, system file size, system update time, system boot time, device user name, RAM (random access memory), remaining available RAM, CPU version. We or our business partners may also collect international mobile equipment identity (IMEI) and Android ID solely for mainland China.

In particular, where Ignite Media acts as Demand Side Platform ("DSP") serving ads to Ad Exchange, our business partners acting as our Ad Exchange may collect and share your personal information with us including the following: screen size & orientation, device make, model, operating system, operating system version, device type, version and characteristic of the app used by you when you interact with the Ignite Media Services, carrier information, network connection type, IP address, user-agent; country, time zone and locale settings (country and preferred language) and mobile advertising identifier (e.g. Apple IDFA or Google advertising ID).

We provide Ignite Media Service for our business partners such as mobile application developers and advertisers. We may collect name, job title, email address, account name and password, IP address and address of individuals using

Ignite Media Services on behalf of our business partners, such as employees of our mobile application developers or advertisers.

We cooperates with reputational ad exchange platforms. The ad exchanged platforms may receive an ad request containing your personal information and transfer to Ignite Media to build your profile, personalize your ad experience, and serve future ads you may see on the internet. Notwithstanding the forgoing, Ignite Media will only collect your personal information which are transferred from our partnered Ad Exchange through their ad request. Ignite Media will not collect any information beyond the scope of the information transferred from our partnered Ad Exchange through their ad request.

We access, preserve and share, use and share your information to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal information but is not considered personal information as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature, to generate statistics about our users, or to calculate ad impressions served or clicked on.

We do not collect special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

#### HOW WE USE YOUR INFORMATION

We use the information we collect about you for the following purposes:

- (1) to administer Ignite Media Services (i.e. to provide Ignite Media Services to you) and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes (i.e. to guarantee Ignite Media Services' stability and security) and to solicit your feedback;
- (2) to personalize the contents that you receive and provide you with tailored content that will be of interest to you;
- (3) to provide you with user support and to improve, develop Ignite Media Services and facilitate product development;
- (4) to enable us and our advertising partners to provide ads that may be more relevant to your interests. Where required, our business partners (e.g. publishers) will obtain User consent for and on our behalf for our processing of User personal information for profiling and displaying ads, including personalized ads or behavioral ads, on a User's device. A User can withdraw their consent at any time;
- (5) to enable our messenger service to function and to communicated with you;
- (6) to help us detect abuse, fraud, and illegal activity on Ignite Media Services;
- (7) to review pictures, images and contents posted or generated on Ignite Media Services to ensure that we comply with any applicable content regulations in any relevant jurisdiction;

- (8) to enforce our terms, conditions, and policies; and
- (9) to comply with other applicable laws and regulations, 遵守其他适用的法律法

We may also collect and use personal information of Users who are representing our business partners to use Ignite Media Service (e.g. employees of our publishers or advertisers) for purpose of business contact and direct marking (e.g. sending marketing emails). Where required, our business partner will obtain such Users' consent for and on our behalf for our processing of their personal information.

## HOW WE SHARE YOUR INFORMATION

We may disclose the User's personal information to our business partners, including our advertisers, to report the measurement of the performance and effectiveness of ads that User see or interact with, including measuring the traffic quality in order to perform our contractual obligations to our business partners (e.g. advertisers), and to prevent fraudulent activity. These business partners may use the Users' personal information to measure Users' ad/site interaction and evaluate the performance and effectiveness of ads that User see or interact with, identify Users' interest areas, better understand the site and app traffic usage or User behavior in order to improve their services. Our business partners' use of the information that we disclose to them will be governed by their privacy policies.

We may also use third party technical service providers (e.g. cloud service provider) to process the Users' personal information for purpose of ensuring systems and processes work properly and securely, and for purpose of data storage.

We may also share aggregate or anonymous information with other third parties in accordance with the terms of this Policy.

Our affiliates may also have access to Users' personal information for the purposes set out in this Privacy Policy.

We may share Users' personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others, including to advisers, law enforcement agencies, judicial and regulatory authorities. We may also transfer Users' personal information to a third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganisation or otherwise.

Except for the above, we will not disclose or share with any third party your personal information, unless under the following circumstances:

- (1) if we obtained your consent, either implied or express;
- (2) if we are required to do so in order to comply with the applicable laws and regulations and government requests;
- (3) If we believe in our good faith that this is necessary to protect the public interest:
- (4) If it is necessary to do so to protect the safety and fundamental rights of another person;
- (5) If it is necessary to address fraud, security, or technical issues; and
- (6) If it is necessary to ensure the enforcement of our terms and conditions and the daily operation of Ignite Media Services.

#### YOUR RIGHTS

You can opt-out from receiving interest-based advertising or behavioural advertising from Ignite Media on supported devices following the guideline below.

Your iOS mobile device may provide a "Limit Ad Tracking" setting. On Android devices, your settings may allow you to "Opt out of Interest-Based Ads." When you have opted out using this setting on a device, Ignite Media will not use inapp information collected from that device to infer your interests or serve ads to that device that are targeted based on your inferred interests.

Your mobile web browser may also provide a "Do Not Track" browser setting. When you have enabled this setting in your browser, Ignite Media will not use mobile web browsing information from that browser to infer your interests or serve ads to that device that are targeting based on your inferred interests.

## RETENTION

Ignite Media may retain the information relating to you collected from our business partners as necessary for the provision of the services, internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements (e.g. settlement). We will only keep your personal information for as long as necessary and in any event in relation to personal information collected by us according to this Policy we will only keep this personal information for no less than two (2) years. The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

We maintain servers around the world and your information collected by us are firstly stored and processed in servers nearest to your region, but in several cases your information may be stored and processed in any other country where we maintain data collection facilities. We have complied with relevant applicable data localization rules with respect to our data transfer practices. We take appropriate steps to ensure that the information we collected is processed in accordance with the privacy policy and the relevant applicable laws and regulations. If we provide any information about you to any legal agency, we will take appropriate measures to ensure such receiving institutes protect your information adequately in accordance with this privacy policy and the applicable laws.

## SECURITY OF YOUR INFORMATION

We take appropriate administrative, technical and physical security measures to safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of certain your personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of your personal information. You should use caution whenever submitting information through Ignite Media Services and take special care in deciding which information you provide us with.

You are responsible for maintaining the secrecy of your password and account information at all times.

#### MARKETING

We may contact you periodically by e-mail to provide information regarding our products, services and content that may be of interest to you. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.

If you decide at any time that you no longer wish to receive such communications from us, you may follow the unsubscribe instructions provided in any of the communications or request to be opted-out of receiving such communications via email to official@liftymedia.com.

## CHILDREN PROTECTION

Ignite Media Services is not directed to children, and if you are under the age of 16 years old or other age of majority as required by the laws of the country of

your domicile, you may not create a Ignite Media account or use Ignite Media Services. We have zero tolerance to any form of child abuse or exploitation. Your data (including private messages) may be shared with legal agencies if we in our good faith believe that you have engaged in child abuse, or if we are requested to do so by relevant legal agencies.

#### MODIFICATIONS

We may amend any of the terms of the privacy policy by posting the terms. We will also update the "Last Updated" date at the top of this policy, which reflects the effective date of such policy. Your continued access to or use of Ignite Media Services after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop accessing or using Ignite Media Services.

## CONTACT INFORMATION

#### IGNITE MEDIA HK LIMITED

Room 603E, 6/F, Hang Pont Commercial Building, 31 Tonkin Street, Cheung Sha Wan, Kowloon, Hongkong

If you have any questions about this privacy policy or our information—handling practices, please contact us at official@liftymedia.com.

## U.S. TERMS

#### INTRODUCTION

This Policy describes the information that Ignite Media collects from visitors to any mobile application in relation to the Website and how we use it, how we protect it, and your rights to:

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- (2) interact with the Ignite Media Services; or
- (3) interact with platforms, applications, websites or other services provided by Ignite Media's business partners (e.g. app publisher, advertiser).

Our technology enables our partners to show Users more relevant advertising that is based on Users' interests and behaviors. In order to provide Ignite Media Services, we may collect and use certain information about User activity and preferences. We understand how important it is to keep such User's personal information confidential and discrete, especially in today's online world. To

this end, we have designed this Policy in a format that is easy to navigate and read so that our privacy practices can be clearly understood.

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We collect your personal information on the following grounds:

- (1) We need to process such information to deliver contractual services to you.
- (2) You consent to provide us when you create an account and use Ignite Media Services.
- (3) We collect when we believe it is for our legitimate interests in order to provide you better experiences with Ignite Media Services.
- (4) We collect to serve interest-based ads by building profile about Users.
- (5) We collect for monitoring traffic and measuring the performance and effectiveness of ads including preventing any fraud;
- (6) We need to understanf and analyze Users' usage trends and preferences; and
- (7) We collect for ensuring the safety and security of process and system.

When we collect information about our partners' business representatives such as name and email address, our purpose is to contact them for business communication including necessary communication for purpose of performing the agreements with our partners.

We and/or our business partners may collect and/or process the following User information only as necessary to deliver contractual services as illustrated in the ignite media partner agreement to you:

device make, device model, operating system (e.g. iOS) and the OS version of the device, device type (e.g. smartphone, tablet, etc.), screen size, orientation and battery, carrier information, version and characteristic of the app used by you when you interact with Ignite Media's Service, country, time zone and locale settings (country and preferred language), network connection type, IP address, SDK version, timestamp, network status such as WiFi, mobile advertising identifier (e.g. Apple IDFA or Google advertising ID), device event information such as crashes, system activity, hardware settings, the date and time of your request and referral URL, user-agent, package name of the app of Ignite Media's business partners, IDFV, system file size, system update time, system boot time, device user name, RAM (random access memory), remaining available RAM, CPU version. We or our business partners may also collect international mobile equipment identity (IMEI) and Android ID solely for mainland China.

In particular, where Ignite Media acts as Demand Side Platform ("DSP") serving ads to Ad Exchange, our business partners acting as our Ad Exchange may collect and share your personal information with us including the following: screen size & orientation, device make, model, operating system, operating system version, device type, version and characteristic of the app used by you when you interact with the Ignite Media Services, carrier information, network connection type, IP address, user-agent; country, time zone and locale settings (country and preferred language) and mobile advertising identifier (e.g. Apple IDFA or Google advertising ID).

We provide Ignite Media Service for our business partners such as mobile application developers and advertisers. We may collect name, job title, email address, account name and password, IP address and address of individuals using Ignite Media Services on behalf of our business partners, such as employees of our mobile application developers or advertisers.

We cooperates with reputational ad exchange platforms. The ad exchanged platforms may receive an ad request containing your personal information and transfer to Ignite Media to build your profile, personalize your ad experience, and serve future ads you may see on the internet. Notwithstanding the forgoing, Ignite Media will only collect your personal information which are transferred from our partnered Ad Exchange through their ad request. Ignite Media will not collect any information beyond the scope of the information transferred from our partnered Ad Exchange through their ad request.

We access, preserve and share, use and share your information to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal information but is not considered personal information as this data

does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature, to generate statistics about our users, or to calculate ad impressions served or clicked on.

We do not collect special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

## HOW WE USE YOUR INFORMATION

We use the information we collect about you for the following purposes:

- (1) to administer Ignite Media Services (i.e. to provide Ignite Media Services to you) and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes (i.e. to guarantee Ignite Media Services' stability and security) and to solicit your feedback;
- (2) to personalize the contents that you receive and provide you with tailored content that will be of interest to you:
- (3) to provide you with user support and to improve, develop Ignite Media Services and facilitate product development;
- (4) to enable us and our advertising partners to provide ads that may be more relevant to your interests. Where required, our business partners (e.g. publishers) will obtain User consent for and on our behalf for our processing of User personal information for profiling and displaying ads, including personalized ads or behavioral ads, on a User's device. A User can withdraw their consent at any time;
- (5) to enable our messenger service to function and to communicated with you;
- (6) to help us detect abuse, fraud, and illegal activity on Ignite Media Services;
- (7) to review pictures, images and contents posted or generated on Ignite Media Services to ensure that we comply with any applicable content regulations in any relevant jurisdiction;
- (8) to enforce our terms, conditions, and policies; and
- (9) to comply with other applicable laws and regulations, 遵守其他适用的法律法

We may also collect and use personal information of Users who are representing our business partners to use Ignite Media Service (e.g. employees of our publishers or advertisers) for purpose of business contact and direct marking (e.g. sending marketing emails). Where required, our business partner will obtain such Users' consent for and on our behalf for our processing of their personal information.

We may also collect and use personal information of Users who are representing our business partners to use Ignite Media Service (e.g. employees of our publishers or advertisers) for purpose of business contact and direct marking (e.g. sending marketing emails). Where required, our business partner will obtain such Users' consent for and on our behalf for our processing of their personal information. HOW WE SHARE YOUR INFORMATION

We may disclose the User's personal information to our business partners, including our advertisers, to report the measurement of the performance and effectiveness of ads that User see or interact with, including measuring the traffic quality in order to perform our contractual obligations to our business partners (e.g. advertisers), and to prevent fraudulent activity. These business partners may use the Users' personal information to measure Users' ad/site interaction and evaluate the performance and effectiveness of ads that User see or interact with, identify Users' interest areas, better understand the site and app traffic usage or User behavior in order to improve their services. Our business partners' use of the information that we disclose to them will be governed by their privacy policies.

We may also use third party technical service providers (e.g. cloud service provider) to process the Users' personal information for purpose of ensuring systems and processes work properly and securely, and for purpose of data storage.

We may also share aggregate or anonymous information with other third parties in accordance with the terms of this Policy.

Our affiliates may also have access to Users' personal information for the purposes set out in this Privacy Policy.

We may share Users' personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others, including to advisers, law enforcement agencies, judicial and regulatory authorities. We may also transfer Users' personal information to a third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganisation or otherwise.

Except for the above, we will not disclose or share with any third party your personal information, unless under the following circumstances:

- (1) if we obtained your consent, either implied or express;
- (2) if we are required to do so in order to comply with the applicable laws and regulations and government requests;
- (3) If we believe in our good faith that this is necessary to protect the public interest;
- (4) If it is necessary to do so to protect the safety and fundamental rights of another person;
- (5) If it is necessary to address fraud, security, or technical issues; and
- (6) If it is necessary to ensure the enforcement of our terms and conditions and the

daily operation of Ignite Media Services.

## YOUR RIGHT

You can opt-out from receiving interest-based advertising or behavioural advertising from Ignite Media on supported devices following the guideline below.

Your iOS mobile device may provide a "Limit Ad Tracking" setting. On Android devices, your settings may allow you to "Opt out of Interest-Based Ads." When you have opted out using this setting on a device, Ignite Media will not use inapp information collected from that device to infer your interests or serve ads to that device that are targeted based on your inferred interests.

Your mobile web browser may also provide a "Do Not Track" browser setting. When you have enabled this setting in your browser, Ignite Media will not use mobile web browsing information from that browser to infer your interests or serve ads to that device that are targeting based on your inferred interests.

If you are a California resident, you may request to know, disclose, access or delete your data, collected in the last 12 months. You will need to send an email to official@liftymedia.com if you wish to make such request, and format the subject line as Identification of personal information+Californian+Your Ignite Media ID. We may ask you to go through a verification process, such as using your phone number and an instant pin, before we respond to your request. Please note that we will not be able to handle this kind of request if submitted through postal mail, telephone, or facsimile.

Users domiciled in California are encouraged to designate an authorized agent to exercise their rights of privacy on their half.

## CHILDREN PROTECTION

We ensure that we comply with the Children's Online Privacy Protection Act (COPPA). Publishers with apps directed to children under the age of thirteen (13) must enable the COPPA settings when using the Ignite Media Services. This allows Ignite Media to ensure that any persistent identifiers collected about Users of apps that are flagged as "child-directed" will be processed according to the requirements of COPPA, including not being used to serve behaviorally-targeted ads or track users for such purposes. In addition, we will not knowingly collect any other personal information (such as the precise geo-location of Users' devices) from Users of Apps that we know to be directed to children under the age of thirteen (13).

If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we take reasonable steps to ensure that such information is deleted from our files.

#### RETENTION

WE WILL RETAIN YOUR PERSONAL INFORMATION FOR AS LONG AS REASONABLY NECESSARY FOR THE PURPOSES DESCRIBED IN THIS PRIVACY POLICY, WHILE WE HAVE A LEGITIMATE BUSINESS NEED TO DO SO IN CONNECTION WITH YOUR ACCOUNT, OR AS REQUIRED BY LAWS (FOR EXAMPLE, FOR LEGAL, TAX, ACCOUNTING OR OTHER PURPOSES), WHICHEVER IS THE LONGER.

We maintain servers around the world and your information collected by us are firstly stored and processed in servers nearest to your region, but in several cases your information may be stored and processed in any other country where we maintain data collection facilities. We have complied with relevant applicable data localization rules with respect to our data transfer practices. We take appropriate steps to ensure that the information we collected is processed in accordance with the privacy policy and the relevant applicable laws and regulations. If we provide any information about you to any legal agency, we will take appropriate measures to ensure such receiving institutes protect your information adequately in accordance with this privacy policy and the applicable laws.

To determine the appropriate retention period for your personal information, we will consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## SECURITY OF YOUR INFORMATION

We take appropriate administrative, technical and physical security measures to safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of certain your personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of your personal information. You should use caution whenever submitting information through Ignite Media Services and take special care in deciding which information you provide us with.

You are responsible for maintaining the secrecy of your password and account information at all times.

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If you decide at any time that you no longer wish to receive such communications from us, you may follow the unsubscribe instructions provided in any of the communications or request to be opted-out of receiving such communications via email to official@liftymedia.com.

## NO ERROR FREE PERFORMANCE

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts to comply with this privacy policy and will take prompt corrective action when we learn of any failure to comply with our privacy policy. We shall not be liable for any incidental, consequential, or punitive damages relating to this privacy policy.

#### MODIFICATION

WE MAY MODIFY OR REVISE OUR PRIVACY POLICY FROM TIME TO TIME. ALTHOUGH WE MAY ATTEMPT TO NOTIFY YOU WHEN MAJOR CHANGES ARE MADE TO THIS PRIVACY POLICY, YOU ARE EXPECTED TO PERIODICALLY REVIEW THE MOST UP-TO-DATE VERSION FOUND AT Ignite Media SERVICES SO YOU ARE AWARE OF ANY CHANGES, AS THEY ARE BINDING ON YOU.

If we change anything in our privacy policy, the date of change will be reflected in the "last updated date". You agree to note the date of the last revision to our privacy policy. By continuing to use Ignite Media Services subsequent to us making available an amended version of our privacy policy in a way that you.

## EEA & Switzerland

## INTRODUCTION

This Policy describes the information that Ignite Media collects from visitors to any mobile application in relation to the Website and how we use it, how we protect it, and your rights to:

(1) view ads served by the Ignite Media Services;

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Our technology enables our partners to show Users more relevant advertising that is based on Users' interests and behaviors. In order to provide Ignite Media Services, we may collect and use certain information about User activity and preferences. We understand how important it is to keep such User's personal information confidential and discrete, especially in today's online world. To this end, we have designed this Policy in a format that is easy to navigate and read so that our privacy practices can be clearly understood.

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- (1) We need to process such information to deliver contractual services to you.
- (2) You consent to provide us when you create an account and use Ignite Media Services.
- (3) We collect when we believe it is for our legitimate interests in order to provide you better experiences with Ignite Media Services.
- (4) We collect to serve interest-based ads by building profile about Users.
- (5) We collect for monitoring traffic and measuring the performance and effectiveness of ads including preventing any fraud;
- (6) We need to understanf and analyze Users' usage trends and preferences; and
- (7) We collect for ensuring the safety and security of process and system.

When we collect information about our partners' business representatives such as name and email address, our purpose is to contact them for business communication including necessary communication for purpose of performing the agreements with our partners.

We and/or our business partners may collect and/or process the following User information only as necessary to deliver contractual services as illustrated in the ignite media partner agreement to you:

device make, device model, operating system (e.g. iOS) and the OS version of the device, device type (e.g. smartphone, tablet, etc.), screen size, orientation and battery, carrier information, version and characteristic of the app used by you when you interact with Ignite Media's Service, country, time zone and locale settings (country and preferred language), network connection type, IP address, SDK version, timestamp, network status such as WiFi, mobile advertising identifier (e.g. Apple IDFA or Google advertising ID), device event information such as crashes, system activity, hardware settings, the date and time of your request and referral URL, user-agent, package name of the app of Ignite Media's business partners, IDFV, system file size, system update time, system boot time, device user name, RAM (random access memory), remaining available RAM, CPU version. We or our business partners may also collect international mobile equipment identity (IMEI) and Android ID solely for mainland China.

In particular, where Ignite Media acts as Demand Side Platform ("DSP") serving ads to Ad Exchange, our business partners acting as our Ad Exchange may collect and share your personal information with us including the following: screen size & orientation, device make, model, operating system, operating system version, device type, version and characteristic of the app used by you when you interact with the Ignite Media Services, carrier information, network connection type, IP address, user-agent; country, time zone and locale settings (country and preferred language) and mobile advertising identifier (e.g. Apple IDFA or Google advertising ID).

We provide Ignite Media Service for our business partners such as mobile application developers and advertisers. We may collect name, job title, email address, account name and password, IP address and address of individuals using Ignite Media Services on behalf of our business partners, such as employees of our mobile application developers or advertisers.

We cooperates with reputational ad exchange platforms. The ad exchanged platforms may receive an ad request containing your personal information and transfer to Ignite Media to build your profile, personalize your ad experience, and serve

future ads you may see on the internet. Notwithstanding the forgoing, Ignite Media will only collect your personal information which are transferred from our partnered Ad Exchange through their ad request. Ignite Media will not collect any information beyond the scope of the information transferred from our partnered Ad Exchange through their ad request.

We access, preserve and share, use and share your information to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal information but is not considered personal information as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature, to generate statistics about our users, or to calculate ad impressions served or clicked on.

We do not collect special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

#### HOW WE USE YOUR INFORMATION

We use the information we collect about you for the following purposes:

- (1) to administer Ignite Media Services (i.e. to provide Ignite Media Services to you) and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes (i.e. to guarantee Ignite Media Services' stability and security) and to solicit your feedback;
- (2) to personalize the contents that you receive and provide you with tailored content that will be of interest to you;
- (3) to provide you with user support and to improve, develop Ignite Media Services and facilitate product development;
- (4) to enable us and our advertising partners to provide ads that may be more relevant to your interests. Where required, our business partners (e.g. publishers) will obtain User consent for and on our behalf for our processing of User personal information for profiling and displaying ads, including personalized ads or behavioral ads, on a User's device. A User can withdraw their consent at any time;
- (5) to enable our messenger service to function and to communicated with you;
- (6) to help us detect abuse, fraud, and illegal activity on Ignite Media Services;
- (7) to review pictures, images and contents posted or generated on Ignite Media Services to ensure that we comply with any applicable content regulations in any relevant jurisdiction;
- (8) to enforce our terms, conditions, and policies; and
- (9) to comply with other applicable laws and regulations, 遵守其他适用的法律法

We may also collect and use personal information of Users who are representing our business partners to use Ignite Media Service (e.g. employees of our publishers or advertisers) for purpose of business contact and direct marking (e.g. sending marketing emails). Where required, our business partner will obtain such Users' consent for and on our behalf for our processing of their personal information.

#### HOW WE SHARE YOUR INFORMATION

We may disclose the User's personal information to our business partners, including our advertisers, to report the measurement of the performance and effectiveness of ads that User see or interact with, including measuring the traffic quality in order to perform our contractual obligations to our business partners (e.g. advertisers), and to prevent fraudulent activity. These business partners may use the Users' personal information to measure Users' ad/site interaction and evaluate the performance and effectiveness of ads that User see or interact with, identify Users' interest areas, better understand the site and app traffic usage or User behavior in order to improve their services. Our business partners' use of the information that we disclose to them will be governed by their privacy policies.

We may also use third party technical service providers (e.g. cloud service provider) to process the Users' personal information for purpose of ensuring systems and processes work properly and securely, and for purpose of data storage.

We may also share aggregate or anonymous information with other third parties in accordance with the terms of this Policy.

Our affiliates may also have access to Users' personal information for the purposes set out in this Privacy Policy.

We may share Users' personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others, including to advisers, law enforcement agencies, judicial and regulatory authorities. We may also transfer Users' personal information to a third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganisation or otherwise.

Except for the above, we will not disclose or share with any third party your personal information, unless under the following circumstances:

- (1) if we obtained your consent, either implied or express;
- (2) if we are required to do so in order to comply with the applicable laws and regulations and government requests;
- (3) If we believe in our good faith that this is necessary to protect the public interest;

- (4) If it is necessary to do so to protect the safety and fundamental rights of another person;
- (5) If it is necessary to address fraud, security, or technical issues; and
- (6) If it is necessary to ensure the enforcement of our terms and conditions and the daily operation of Ignite Media Services.

#### INTERNATIONAL TRANSFERS

When you are located in the EEA, personal information collected from you, including through our Ignite Media Service, will be transferred to recipients in countries located outside the EEA, including in China, US and countries which may not be decided by the European Commission that it provides an adequate level of protection to personal information. Where required by law, the publisher and/or advertiser will obtain your consent to the transfer of your personal information to Minegral, Ignite Media's affiliates, and/or any recipients as described in this Privacy Policy, which are located outside the EEA. You may withdraw your consent at any time.

## YOUR RIGHTS

You have the following rights with respect to our collection of the Personal Information we collect about you. We will respond to your request consistent with the applicable laws as soon as practicable, normally within one month, after proper verification procedures. Your exercise of these rights is usually free of charge, unless we deem it is chargeable under the applicable laws. We WILL NOT DISCRIMINATE due to your exercise of any right to privacy.

Right to access-You may submit a request to access the Personal Information we collect about you by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com.

Right to rectification-You may submit a request to rectify the Personal Information we collect about you by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com.

Right to erasure-You may submit a request to erase the Personal Information we collect about you by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com. Though we cannot guarantee a complete erasure of your data that have been stored in our backup servers, we promise that we will not use the data within the backup servers for any other purpose.

Right to data portability-You may ask us to transfer some of your Personal Information, if it is collected on the basis of your consent, in structured, commonly used and machine-readable formats to you or other environments designated by you, if technically feasible, by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com.

Right to withdraw consent-You may withdraw your consent and ask us not to continue to collect or process your Personal Information at any time if that information is collected on the basis of your consent by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com. Your exercise of this right will not affect the processing activities occurred before your withdrawal.

Right to restrict processing-You may request us to stop processing your Personal Information if you believe such information is collected unlawfully or you have other particular reason for wanting the restriction by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com. We will examine your request and respond accordingly.

Right to object-You may object to the processing of any Personal Information we collect about you, if such information is collected on the basis of legitimate interests, at any time by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com. Please note that we may reject your request if we demonstrate compelling legitimate grounds for the processing, which override your interests and freedom or the processing is for the establishment, exercise, or defense of legal claims.

Right in relation to automated decision making and profiling-You may ask us to stop automated decision making or profiling you if you believe such automated decision making and profiling has legal or similarly significant effect upon you by (a) using Help or Feedback function on Ignite Media Services or (b) by sending your request to us via email at official@liftymedia.com. We will examine your request and let you know if your request is applicable under the relevant laws and regulations.

In addition to the foregoing rights, you also have the right to lodge complaints before the competent data protection authority ("DPA"), usually the DPA of your home country.

## CHILDREN PROTECTION

We are committed to protecting the privacy of users under the age of consent in the relevant countries ("Young User"). Ignite Media Services is not directed to Young Users.

If you believe that we have inappropriately collected Personal Information from a Young User, please contact us at official@liftymedia.com.

## RETENTION

WE WILL RETAIN YOUR PERSONAL INFORMATION FOR AS LONG AS REASONABLY NECESSARY FOR THE PURPOSES DESCRIBED IN THIS PRIVACY POLICY, WHILE WE HAVE A LEGITIMATE BUSINESS NEED TO DO SO IN CONNECTION WITH YOUR ACCOUNT, OR AS REQUIRED BY LAWS (FOR EXAMPLE, FOR LEGAL, TAX, ACCOUNTING OR OTHER PURPOSES), WHICHEVER IS THE LONGER.

We maintain servers around the world and your information collected by us are firstly stored and processed in servers nearest to your region, but in several cases your information may be stored and processed in any other country where we maintain data collection facilities. We have complied with relevant applicable data localization rules with respect to our data transfer practices. We take appropriate steps to ensure that the information we collected is processed in accordance with the privacy policy and the relevant applicable laws and regulations. If we provide any information about you to any legal agency, we will take appropriate measures to ensure such receiving institutes protect your information adequately in accordance with this privacy policy and the applicable laws.

To determine the appropriate retention period for your personal information, we will consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we use your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### SECURITY OF YOUR INFORMATION

We take appropriate administrative, technical and physical security measures to safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of certain your personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of your personal information. You should use caution whenever submitting

information through Ignite Media Services and take special care in deciding which information you provide us with.

You are responsible for maintaining the secrecy of your password and account information at all times.

#### MARKETING

We may contact you periodically by e-mail to provide information regarding our products, services and content that may be of interest to you. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.

If you decide at any time that you no longer wish to receive such communications from us, you may follow the unsubscribe instructions provided in any of the communications or request to be opted-out of receiving such communications via email to official@liftymedia.com.

## NO ERROR FREE PERFORMANCE

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts to comply with this privacy policy and will take prompt corrective action when we learn of any failure to comply with our privacy policy. We shall not be liable for any incidental, consequential, or punitive damages relating to this privacy policy.

## **MODIFICATION**

WE MAY MODIFY OR REVISE OUR PRIVACY POLICY FROM TIME TO TIME. ALTHOUGH WE MAY ATTEMPT TO NOTIFY YOU WHEN MAJOR CHANGES ARE MADE TO THIS PRIVACY POLICY, YOU ARE EXPECTED TO PERIODICALLY REVIEW THE MOST UP-TO-DATE VERSION FOUND AT Ignite Media SERVICES SO YOU ARE AWARE OF ANY CHANGES, AS THEY ARE BINDING ON YOU.

If we change anything in our privacy policy, the date of change will be reflected in the "last updated date". You agree to note the date of the last revision to our privacy policy. By continuing to use Ignite Media Services subsequent to us making available an amended version of our privacy policy in a way that you.