Privacy Policy VERSION FROM: DECEMBER 17, 2023 EFFECTIVE: DECEMBER 18, 2023 – JUNE 25, 2024

## Thank you for using Club Penguin Atake.

Referred to in this document as 'We', the 'Site', 'Us'.

Introduction to the Privacy Policy

We cover the different data and privacy information incorporated in the website and applications in our Privacy Policy.

This Privacy Policy describes how you can delete, manage, or export your data from Club Penguin Atake in addition to defining the sorts of data we gather. We recognise the significant responsibility that comes with providing sensitive information and are committed to maintaining its security.

Before using any Club Penguin Atake websites or applications, please read the policies in this document.

We've given explanatory phrases and examples to make things as clear as possible. If you have any questions about this Privacy Statement, please email us at <u>privacy@fullmoon.dev</u>.

If you do not agree to our policies ("Terms of Service", "Privacy Policy", "Community Guidelines", "Advertised, Partnered & External Services Policy"), please stop using our services immediately.

#### **Ownership Statement**

By using Club Penguin Atake, you accept that we are completely separate from The Walt Disney Company and/or the Disney Interactive Media Group (collectively, "Disney"). We are an independent project. We do not have any contact with Disney. You agree to release Disney, as well as any of its employees or agents, from any liability, corporate, or personal loss caused as a consequence of the use of our services.

#### Information you provide us

Club Penguin Atake obtains information about you primarily from data that you submit to our services.

• Information about you:

By using Club Penguin Atake's services you submit data to create an account. You can read more about this process here. The data provided by you is your email, Club Penguin Atake username and password. Your password is securely encrypted and is not visible to anyone, including our Staff. Club Penguin Atake only uses this data for account management and it is not shared with anyone else without further notice before. Google Analytics collects first-party cookies, data related to the device/browser, IP address (when collecting data, Google Analytics 4 does not log or store IP addresses), and on-site/app activities to measure and report statistics about user interactions on the websites and/or apps that use Google Analytics. We use Google Analytics to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services.

- Advertised, Partnered & External services: Please visit the Advertised, Partnered & External Services Policy, always available at https://www.cpatake.boo/policies/partners.
- Digitally transmitted requests or inquiries sent to us via forms on our website, including the sign in and registration areas located on our applications: We save correspondence data to better serve your needs. We make every effort to anonymize the data we acquire from you when you submit data via the app's forms. Anti-spam procedures, particularly on third-party forms or services, may capture your IP address.

We actively gather information required from you when you use the features of our sign in and registration pages, primarily: a valid email address, penguin username and password. Your password is securely encrypted and is not visible to anyone, including our Staff. Both of the features we receive from these sites are used to keep the user account active.

## Data obtained from third parties

Club Penguin Atake collects first-party & third-party information from via our website and app analytics - Google Analytics.

We use Google Analytics to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising.

Google Analytics collects first-party cookies, data related to the device/browser, IP address (when collecting data, Google Analytics 4 does not log or store IP

addresses), and on-site/app activities to measure and report statistics about user interactions on the websites and/or apps that use Google Analytics.

For more information about how Google collects and uses your data, visit the Google Privacy Statement: how Google uses data from sites and apps that use Google's services. For information on how Google protects your data, visit this website - support.google.com/analytics/answer/6004245.

Per request we will notify you via email: <u>privacy@fullmoon.dev</u> of the source of information and the type of information we have gathered about you within a reasonable time after receiving the personal data, but no later than one month.

## Cookies

We use Cookies delivered by Google Analytics to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies

If you do not want Google Analytics to collect your data across every website on your browser, please download and install the Google Analytics Opt-out Browser Add-on.

## Your Security Rights

Club Penguin Atake substantially provides opportunities for members to adjust account information or terminate their engagement with the website under these terms. Furthermore, under applicable data privacy rules, you have specific rights in particular regions (such as the European Economic Area). These may include the right to

- request access to and a copy of your personal information,
- request modification or erasure,
- limit the processing of your personal information,
- data portability, where applicable.

You may also have the right to object to the processing of your personal information in certain circumstances. Please send a written notice to <u>privacy@fullmoon.dev</u> to make such a request. Any request will be considered and handled in compliance with applicable data protection legislation.

If we are processing your personal information with your consent, you have the right to withdraw your consent at any time. Please keep in mind that this has no bearing on the legality of the processing prior to its withdrawal.

# Your California Privacy Rights

This Club Penguin Atake Privacy Policy conditional section only applies to California residents.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, allows our California users to request and obtain information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes, as well as the names and addresses of all third parties with whom we shared personal information in the immediately preceding calendar year, once a year and free of charge.

If you are a California resident and would like to make such a request, please send us an email at <u>accounts@fullmoon.dev</u> with the topic "My California Privacy Rights" in the subject line.

If you are under the age of 18, live in California, and have a registered account with Club Penguin Atake, you have the right to have unwanted data publicly posted on the Application or Website removed. To request the removal of such data, please send an email to <u>accounts@fullmoon.dev</u> with the subject "My California Privacy Rights" and include the email address associated with your account as well as a statement that you live in California. We will make certain that the data is not publicly shown on our website/app, but please be aware that it may not be totally or completely erased from our systems.

## Revisions

Club Penguin Atake reserves the right to make changes to this privacy policy at any time. These conditional policies may be updated in response to abuse or security concerns, regulatory or legal requirements, or changes in our policies.

Privacy Polices of the services we use/associated with us Please visit the Advertised, Partnered & External Services Policy, always available at https://www.cpatake.boo/policies/partners.

This is no longer the current version. Visit <u>https://www.cpatake.boo/policies/privacy</u> to see the latest version.