

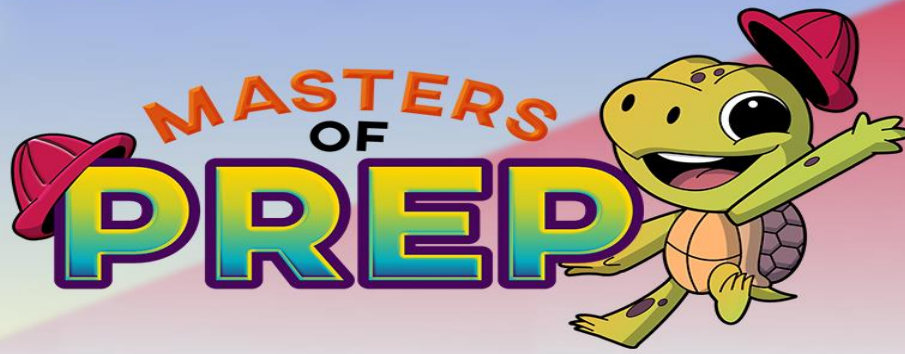
DIGICEL “MASTERS OF PREP” PRIVACY POLICY

Please read this Privacy Policy (“Policy”) before using Masters of Prep (“Game”). This Policy is provided to help you understand how we collect, use, share, protect and otherwise deal with Player’s information, along with detailing any rights Players may benefit from under applicable law.

Who We Are

The data controller for this Service is Digicel Trinidad and Tobago Foundation located at ANSA Centre, IIC Maraval Road, Port-of-Spain, Trinidad & Tobago. We value the privacy of all Players (“Player”) and in particular children and their information. This Policy serves to explain the collection, use and security of children’s information when interacting with the Game.

In this Policy “we”, “us” and “our” refers to Digicel (“Digicel”). As this Policy applies globally, there may be differences in how we collect, use, share protect, disclose or otherwise use your Personal Data from country to country, in which case we will inform you about any specific processing activities that take place in specific countries.



Definitions

By “Game” we mean the app known as Masters of Prep.

By “Personal Data” we mean any information relating to an identified or identifiable individual. This is broader than just information of a personal or private nature, and also includes information such as a Player’s name, date of birth, and e-mail address.

By “Player” we mean any individual who uses or plays the Game.

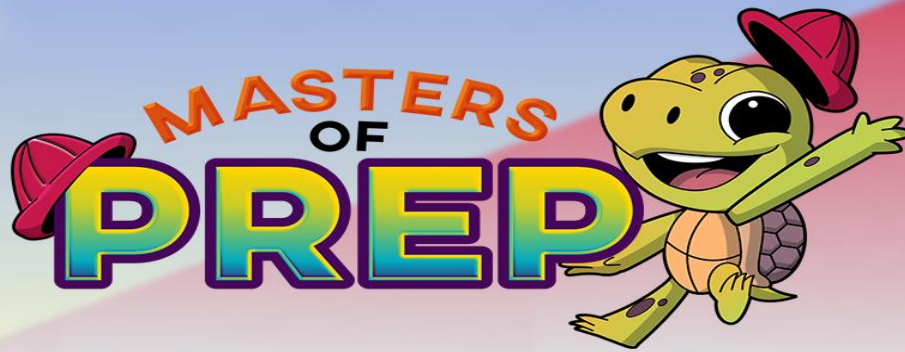
By “Parent” we mean the parent or guardian of any Player under the age of 13 or as otherwise considered a child under applicable law.

Data controller shall have the meaning given to it in applicable law, and in this Policy means Digicel.

Scope of this Policy

This Policy applies to all Personal Data we collect, use, share or otherwise process through delivery of the Game.

There are no hyperlinks to links to any third party websites or apps within the Game.



Players under the age of 13

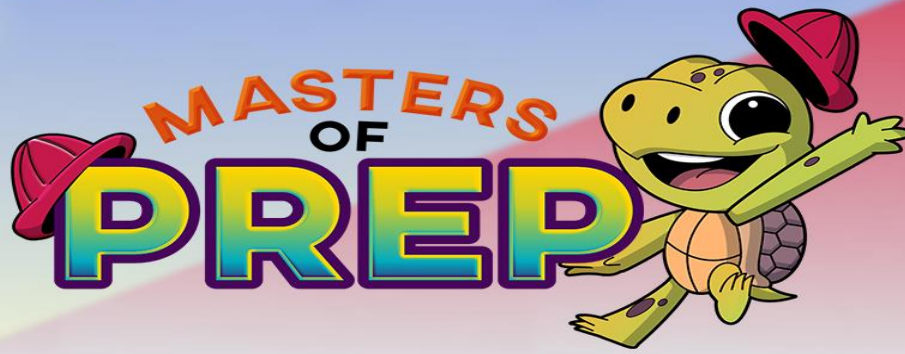
We do not allow Players under the age of 13 to register or share any Personal Data with us and we do not solicit, collect or process in any way any Personal Data of a Player under the age of 13. If you believe we have inadvertently processed Personal Data of a Player under the age of 13, please contact us at the details provided. If we discover that we have inadvertently processed the Personal Data of any Player under the age of 13, we will permanently delete such Personal Data from all of our systems as soon as possible.

Information we Collect

Digicel may collect limited Personal Data as part of our business operations, to provide the Game, to respond to requests and offer customer support, and to develop our products. Some of this Personal Data is provided directly by Players or Parents, such as when they download and use the Game or contact customer support.

We may collect the following:

- IP Address
- Content Viewed
- Frequency of visits and use
- Information about a Players' personal device



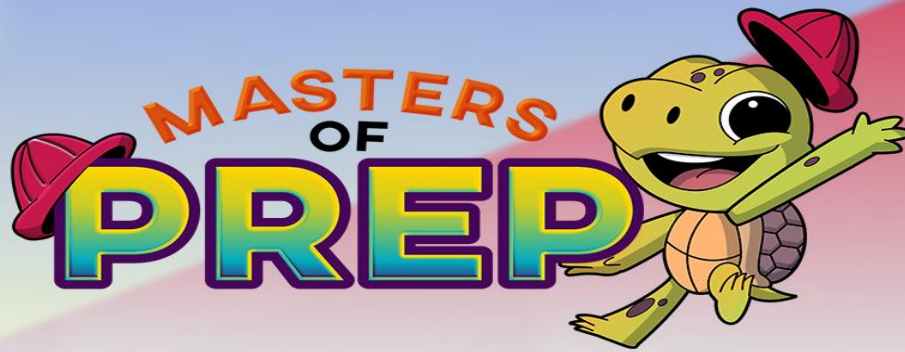
We will not process sensitive personal data (in some countries referred to as “special categories of data”) in any use of the Game. We do not use cookies.

Use

We use Player Personal Data for our legitimate business interests. These include the maintenance, development and improvement of the Game, and the improvement of Player experience by providing content which we believe they are interested in.

We may also use this information for the following reasons:

1. to meet our legal and regulatory obligations
2. to maintain, develop and improve the Game
3. to ensure the effective delivery of the Game which may include customer service and technical support
4. to better understand Player’s behaviours in order to provide more relevant information and to develop and evaluate new services
5. to examine the degree of effectiveness of our marketing campaigns and degree of satisfaction of our customers;
6. to tell Players about our products and services, and to send promotional materials (such as announcements relating to new products) relating to our brands, (subject to Player or Parental valid consent to such marketing where required by applicable law);



7. to manage our Game, and its responsiveness to previous activities,;
8. for administration and general record keeping including accounting, auditing and billing activities
9. for other business purposes that depend on Player's Personal Data including crime or fraud monitoring and prevention, and protecting our legal rights
10. to complete a merger or sale of assets.

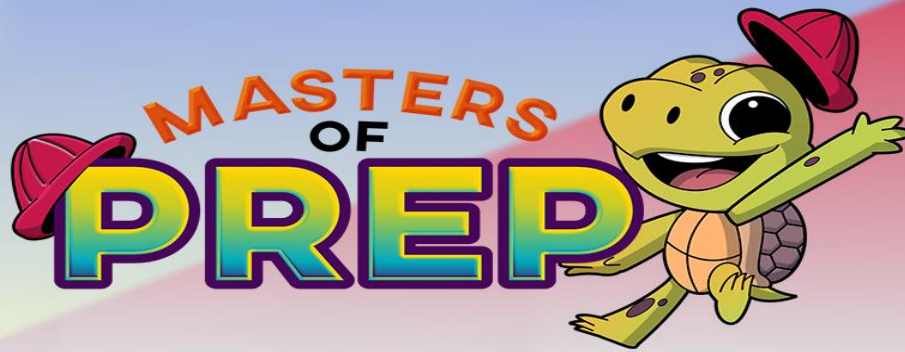
Digicel may create anonymous data records from Personal Data by excluding all information (such as Player IP address) that makes the data personally identifiable to a Player.

Disclosing Player Personal Information

We may disclose Personal Data to any member of our group, which means our subsidiaries, our parent company and its subsidiaries as defined in section 1159 of the Companies Act 2006.

We may disclose Personal Data to third parties if we are lawfully required to do so or in the event that we sell our business or any part of it is acquired by a third party.

We may also disclose non-personal information with third party partners who work with us.



Service Providers

We may work with service providers such as Google Play in the delivery and distribution of the Game. Their privacy policy can be found here.

<https://www.google.com/policies/privacy/>

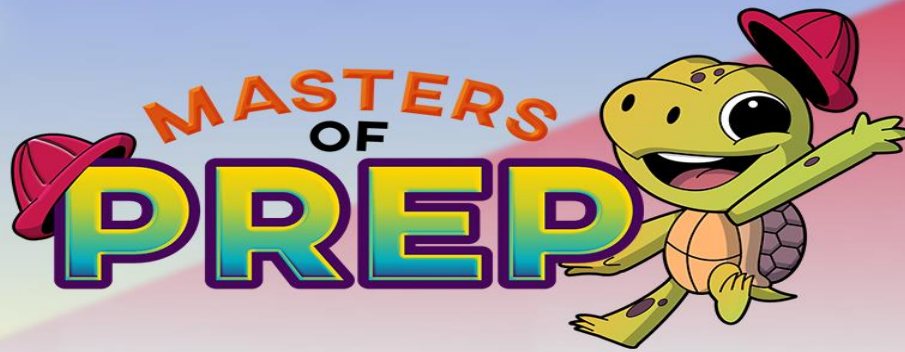
International Transfer of Data

Where lawful, we may transfer Personal Data internationally to companies in the Digicel Group, our partners and service providers involved in delivering and maintaining the Game and our products and services. If we do transfer any Player Personal Data to other countries, we will always ensure that there is an adequate level of protection and any related legal requirements are in place.

If a Player or Parent would like further information about this please contact us via email digicelfoundationtt@digicelgroup.com.

Security

Digicel will use the all reasonable measures to safeguard all Personal Data against unauthorized use, theft, modification, loss or disclosure. We take steps to ensure the minimisation of any Personal Data we may process.



Storage

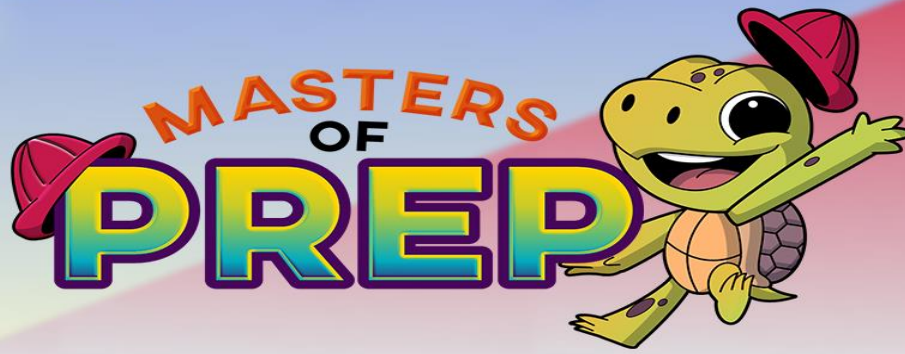
Digicel will take all appropriate technical and organisational security measures to protect Personal Data against unauthorised access and unlawful processing, accidental loss, damage or destruction.

Digicel keep all Personal Data for no longer than is necessary for the purposes set out in this Policy unless we are required to retain it for a longer period to comply with legal, tax or regulatory reasons. Digicel we will securely delete all Personal Data as soon as it is no longer required and ensure all recipients of this Personal Data also comply with the same.

For meeting, legal and regulatory requirements, we retain Personal Data as it is set out by the applicable law; and in all other cases, we process Personal Data, depending on the type, for up to 2 years from the date of our last interaction with a Player and/ or Parent.

Parent and Player Data Subject Rights under the General Data Protection Regulation

Depending on your location, Players and/ or Parents may have various rights in relation to Personal Data. In particular, they may have the right to:



Request a copy of Personal Data we hold;

Ask that we restrict the way in which we use Personal Data;

Ask that we update the Personal Data we hold, or correct any Personal Data that may be incorrect or incomplete;

Ask that we delete Personal Data that we hold (the “right to be forgotten”);

Withdraw consent at any time to our processing of Personal Data (to the extent such processing is based on consent);

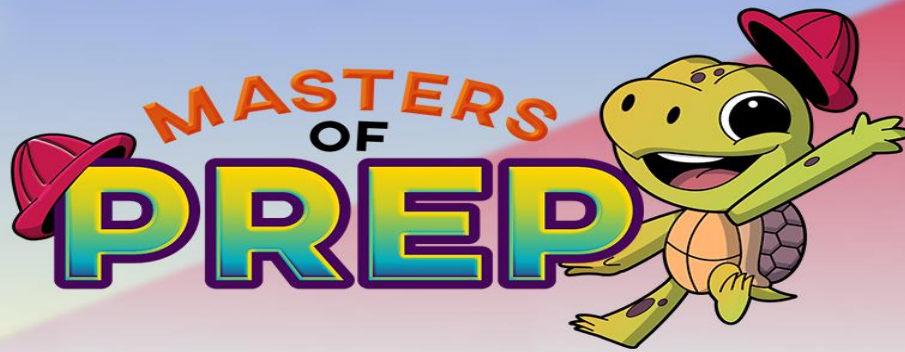
Object to our processing of Personal Data (including for direct marketing purposes); or

Request Personal Data be transferred to you or another data controller (the “data portability” right).

In order to enact any Data Subject rights, please contact us as detailed. Please note that, in the event you request that we change or delete Player Personal Data, we may still need to retain certain information as is required by applicable law.

Complaints

If you are unhappy with the way we have handled a Players Personal Data or have any privacy query, you can contact us as detailed. Additionally, you have a right to complain to your local data protection regulator.



Direct Marketing

We do not carry out any direct marketing through or as a result of or response to Player's use of the Game.

Automated Decision Making

We do not use Personal Data to make automated decisions about Players or any other individuals.

Links

The Game does not contain links to other third party websites.

Changes to our Privacy Policy

This Policy was last updated on June 8, 2020

We may change this Policy from time to time, and we recommend that Players and Parents review it regularly. If we make significant changes to this privacy, we will endeavour to inform Players and Parents directly, in addition to publishing the updated policy here. We will treat a Player's continued use of the Services as acceptance of this Policy in its then published format, unless a Player and/ or Parent's explicit consent is required by applicable data protection laws.