

# FLA's Privacy Policy

**Updated: May 2016**

Protecting your privacy is very important to us. Accordingly, we're providing this Privacy Policy to explain our practices regarding the collection, use and disclosure of information that we receive when you use our Services (defined as the services included in "Services" as defined in our **User Terms of Service**). This Privacy Policy applies only to those websites, services and applications included within "Services" and doesn't apply to any third-party websites, services or applications, even if they are accessible through our Services. Also, please note that, unless we define a term in this Privacy Policy, all capitalized words used in this Privacy Policy have the same meanings as in our Terms of Service.

## **How do we collect and use information?**

Our primary goals in collecting information are to provide and improve our Services, and to enable you to enjoy and easily navigate our Services.

Information Collected from use of our Services:

- 1) Your device's OS information, including version,
- 2) Your interaction with our App and Services.
- 3) Any user input information into the app.

We save this information in the device using facilities provided by Amazon Web Services ("AWS"), including their mobile device APIs. These APIs include mechanisms provided by AWS to convert your manually selected choice of account ID into a userID that we use across your use of our Services. We send this data to the AWS cloud using AWS's cloud API. Cloud data upload only happens when the user is connected, on Wifi or via a cellular connection.

Information Related to Use of the Services. Our app automatically records certain information about how a person uses our Services (we refer to this information as "Log Data"). Log Data may include information such as a user's device vendor identifier, device ID, the specific portions or features of our service that the user was using and the time spent on them, operating system, and interactions between the user and the services. We use this information to administer the Services and we analyze (and may engage third parties to analyze) this information to improve and enhance the Services by expanding their features and functionality and tailoring them to our Users' needs and preferences. We also use the user's device ID to generate aggregate, non-identifying information about how our Services are used.

Location Information. We may collect and store information about where you are located, such as by converting your mobile GPS data into a rough geolocation. We may use location information to improve and personalize our Services for you.

### **What Information Do We Share With Third Parties?**

We will not share any information that we have collected from you except as described below:

Information Shared with Third Parties. We may share aggregated information and non-identifying information with third parties for service usage analysis, demographic uses and other similar purposes.

Information Disclosed for Our Protection and the Protection of Others. It is our policy to protect you from having your privacy violated through abuse of the legal systems, whether by individuals, entities or government, and to contest claims that we believe to be invalid under applicable law. However, it is also our policy to cooperate with government and law enforcement officials and private parties. Accordingly, we reserve the right to disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary: (i) to satisfy or comply with any applicable law, regulation or legal process or to respond to lawful requests, including subpoenas, warrants or court orders; (ii) to protect our property, rights and safety and the rights, property and safety of third parties or the public in general; and (iv) to prevent or stop activity we consider to be illegal or unethical.

### **The Security of Your Information.**

We take reasonable measures to protect the information that we collect from or about you from unauthorized access, use or disclosure. Please be aware, however, that no method of transmitting information over the Internet or storing information is completely secure. Accordingly, we cannot guarantee the absolute security of any information.

### **Links to Other Sites.**

Our Services may contain links to other websites and services. Any information that you provide on or to a third-party website or service is provided directly to the owner of the website or service and is subject to that party's privacy policy. Our Privacy Policy does not apply to such websites or services and we're not responsible for the content, privacy or security practices and policies of those websites or services. To protect your information we recommend that you carefully review the privacy policies of other websites and services that you access.

### **Modifying Your Information.**

If you want us to modify or delete any or your information, please contact us at [guidedplay.fl@us.fujitsu.com](mailto:guidedplay.fl@us.fujitsu.com) with your request. We'll take steps to delete your information as soon as is practicable, but some information may remain in archived/backup copies for our records or as otherwise required by law.

### **International Transfer**

Your general non-identifiable information may be transferred to, and maintained on, computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction.

### **Our Policy Toward Children**

We do not contact or collect personal information from children under 13 years without the express written consent of the child's parents. If you believe we have inadvertently collected such information without your consent, please contact us immediately.

### **Changes to Privacy Policy**

Any information that we collect is subject to the privacy policy in effect at the time such information is collected. We may, however, modify and revise this Privacy Policy from time to time. If we make any material changes to this Privacy Policy, we'll notify you of such changes by posting them on the Services or by sending you an email or other notification, and we'll indicate when such changes will become effective.

### **Questions?**

Please contact us at [guidedplay.fl@us.fujitsu.com](mailto:guidedplay.fl@us.fujitsu.com), if you have any questions about our Privacy Policy.

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