



## CHILDREN'S PRIVACY POLICY

Dated 12/15/18

YULU, including #SNAPSTAR Design Studio App and #SNAPSTAR YouTube channel, is committed to protecting the privacy of children who use our applications and our sites. This Children's Online Privacy Policy explains our information collection, disclosure and parental consent practices with respect to information provided by children under the age of 13, and uses terms that are defined in our general PRIVACY POLICY (<http://www.yulutoys.com/privacy-policy/>). This policy is in accordance with the U.S. Children's Online Privacy Protection Act ("COPPA"), and outlines our practices in the United States and Canada regarding children's personal information. For more information about COPPA and general tips about protecting children's online privacy, please visit OnGuard Online (<HTTPS://www.CONSUMER.FTC.GOV/ARTICLES/0031-PROTECTING-YOUR-CHILD-PRIVACY-ONLINE>). If you have questions or concerns about our privacy practices, please contact us at <http://www.yulutoys.com/contact/>.

### 1. COLLECTING INFORMATION FROM CHILDREN.

The #SNAPSTAR Design Studio App does not collect any information from users. It does not require a registration process in which personal information may be collected. The App is targeted to children and teens under the age of 15 years old.

### 2. CONTENT GENERATED BY A CHILD

Certain activities on the #SNAPSTAR Studio App allows children to create or manipulate photos of the #SNAPSTAR dolls and save it to the App itself or to a camera roll contained on the user's mobile phone. Because the App uses a proprietary "Image Recognition Technology," the App will only properly register images of the #SNAPSTAR dolls and not human faces or images of other doll brands. The taking and manipulation of photos using the App does not require children to provide any personal information and therefore does not result in notice to the parent or require parental consent. The App does not allow a child to insert personal information in their created content. Examples of created content may include photos of #SNAPSTAR dolls in various user-generated poses, insertion of various backdrops and scenes into a #SNAPSTAR doll photograph, make-up and hair designs added digitally to a photo of a #SNAPSTAR doll. Under no circumstances does the App allow or permit a user to post their content directly to any social media or public site. The user can save content in the App or import into their mobile phone or tablet's camera roll.

### 3. CHAT AND TEXTS

The #SNAPSTAR App does not allow a user to text, email, chat, communicate or otherwise interact directly or indirectly with any other user. There is no email or chat functionality in the App.

#### **4. CONTESTS AND SWEEPSTAKES**

For contests and sweepstakes, YULU typically requires only the information necessary for a child to participate, such as first name (to distinguish among family members) and parent email address (to notify the parent where required by law). YULU only contacts the parent for more personalized information for prize-fulfillment purposes when the child wins the contest or sweepstakes.

Of course, some contests and sweepstakes may ask the child to submit their own created content, along with the child's entry. In those instances, we may require parental consent prior to submission.

#### **5. PUSH NOTIFICATIONS**

Push notifications are notifications on mobile and other devices that are typically associated with downloaded applications, and that can communicate to the device holder even when the application is not in use. The #SNAPSTAR Studio App does not use push notifications.

#### **6. GEOLOCATION DATA**

The #SNAPSTAR Studio App does not use geolocation tracking.

#### **7. SOCIAL MEDIA**

The #SNAPSTAR brand has several social media sites on Instagram, SnapChat, Facebook, Twitter and Tic Toc. Our social media sites are monitored regularly and any offending content is removed immediately according to our Child Safety Policies. The #SNAPSTAR App does not connect or allow users to connect to our social media sites from the App.

#### **8. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy is effective as of December 15, 2018 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and consumers should check this Privacy Policy periodically. Your continued use of this service after we post any modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.