



## Privacy Policy

*Last Revised: February 17, 2022*

This Privacy Policy (“**Privacy Policy**”) describes how we collect, use, and disclose information in connection with the use of all websites, applications, and other online products and services provided by us that link to this Privacy Policy, including [www.learnwithhomer.com](http://www.learnwithhomer.com) (and all related subdomains) (the “**Site**”) and the HOMER Learn & Grow, Learn & Play by Fisher-Price and Learn with Sesame Street mobile applications (the “**Mobile Applications**”) and related online and offline services thereto, including any services, transactions, or engagement you might have with us (collectively, the “**Services**”) by you and the children who use your account to access the Services.

Please carefully read this Privacy Policy, which is part of our [Terms of Use](#), before using our Services. If you do not agree with the Terms of Use and/or this Privacy Policy, you must refrain from using our Services. By accessing or using our Services, you agree to our use of your information consistent with the Terms of Use and this Privacy Policy.

Please review the “[Children’s Privacy](#)” section below for details on HOMER’s information collection, use, and sharing practices related to information collected from children.

### INFORMATION WE COLLECT

#### Information You Provide To Us

We collect information you as the adult choose to share with us, including information you enter through the Services. For example, if you are an adult user of the Services or visitor to the Site, when you:

- **Create an account to use the Services or request further information about the Services**, we may collect contact information (such as your name, email address, and phone number), registration data (such as your display name and year of birth, child’s first name and date of birth, child’s interests, username, password, and child’s age), and billing and payment information;
- **Authenticate your identity**, we may collect your name; e-mail address; username; password and other information and documentation to authenticate your identity and verify your permission to allow your child to interact with the Services in compliance with applicable laws and regulations.
- **Interact with the Services**, we may collect information related to your and your child’s completion of activities, interests, and use of our Services as well as other information you enter through the Services;
- **Contact us with questions or for customer service**, we may collect contact information (such as your name, email address, and phone number) as well as any information you provide in connection with your outreach;
- **Participate in promotions, offers, programs, events, surveys, and sweepstakes**, we may collect basic contact information and any other information you provide in connection with these activities; and
- **Refer others to HOMER**, we may collect the contact information (such as name and email address) you provide us about those persons.

Once you, as an adult, are onboarded and authenticated, your child may begin to use the Services. Adults provide HOMER with basic information about the child as listed above and allow the child to use the adult’s account on the adult’s devices. HOMER then collects information about the device (as identified below), the account log in information, information related to the status of the child’s completion of the activities offered

through the Services (“Child Activity Information”), and related automatically collected information (as described below).

### **Information We Collect Through Automated Means**

We may automatically collect, receive, and store certain information in connection with the actions you take on the Services and in connection with use of the Services (“**Device and Usage Data**”). As discussed further below in the “Cookies & Similar Technologies” section, we and our service providers, may use a variety of technologies, including cookies, to assist in this information collection. For example, each time you use the Services, we may automatically collect the type of web browser and operating system you use, the type of device you use (including mobile devices), your IP address, Internet service provider, unique device identifiers, device hardware specifications, other installed software and other information in accordance with your device settings and permissions. We may also collect the pages you view, referring and exit pages, the date and time of your visit, the number of clicks to, from, and within the Services, time spent on each page, usage preferences, and search terms.

We may also collect different types of information about your location, including general location information (such as your IP address and ZIP code) and we may use that information to customize the Services with location-based information and features.

### **Information We Collect from Other Sources**

We may collect information from other sources, such as payment, analytics, and security service providers, survey and marketing providers, social networks, and researchers. For example, we utilize certain analytics tools to improve the Services experience for users. We may also collect information you as the adult have authorized the social networking service to share with us (such as your user ID, public profile information, email address, birthday, friends list, and pages you have “liked”). We may aggregate the characteristics and browsing habits of users, on an anonymized basis, to provide products and services that are more tailored. We may also receive your information when a user provides us with your contact information as part of a referral feature.

## **HOW WE USE INFORMATION**

We use adults’ information to:

- Provide you and your child with the Services, information you request, and a customized experience;
- Manage, verify, and authenticate your account;
- Engage in transactions, including contacting you about your account, billing, remitting, or charging you, and processing payments;
- Improve the Services and our marketing, including customization and personalization;
- Provide you with effective customer service;
- Communicate with you about the Services and contact you with special offers, promotional information, content, publications, and other information we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us) via mail, email, telephone, text messaging, and/or push notifications and display media;
- Analyze use of the Services and improve the content, functionality, and usability of the Services, enhance the user experience, and improve our business;
- Invite you to participate in promotions, sweepstakes, surveys and provide feedback to us;
- Secure the Services and investigate and help prevent fraud, security issues, and abuse;
- Understand, detect, and resolve problems with the Services and other issues being reported;
- Comply with any procedures, laws, and regulations where necessary for our legitimate interests or legitimate interests of others;
- Establish, exercise, or defend our legal rights where necessary for our legitimate interests or the legitimate interests of others, including the enforcement of our [Terms of Use](#), other usage policies and agreements, and other legal terms or controls, or to engage in other legal matters; and

- Fulfill other requests with your consent and for any other purposes disclosed at the time you provide personal information.

We use Child Activity Information to:

- Measure the child's performance in activities;
- Adapt the learning experience to the child's needs;
- Assess the child's progress and provide reports to adults on children's performance on activities;
- Analyze use of the Services and improve the content, functionality, and usability of the Services, enhance the user experience, and improve our business;
- Comply with any procedures, laws, and regulations where necessary for our legitimate interests or legitimate interests of others;
- Understand, detect, and resolve problems with the Services and other issues being reported;
- Comply with any procedures, laws, and regulations where necessary for our legitimate interests or legitimate interests of others;
- Establish, exercise, or defend our legal rights where necessary for our legitimate interests or the legitimate interests of others, including the enforcement of our [Terms of Use](#), other usage policies and agreements, and other legal terms or controls, or to engage in other legal matters; and
- Fulfill other requests with the relevant adult's consent.

### **Combined information**

For the purposes discussed in this Privacy Policy, we may combine the information that we collect through the Services with information that we receive from other sources, both online and offline, and use such combined information in accordance with this Privacy Policy.

### **Aggregate/De-identified Information**

We may aggregate and/or de-identify any information collected through the Services so that such information can no longer be linked to you or your device ("Aggregate/De-Identified Information"). We may use Aggregate/De-Identified Information for any purpose, including without limitation for research and marketing purposes, and may also share such data with any third parties in our discretion.

### **LEGAL BASES FOR USE OF YOUR INFORMATION**

The laws of some jurisdictions, including the European Economic Area ("EEA") and the United Kingdom ("UK"), require that companies only process your "Personal Data" (as that term is defined in the applicable law, like the EU General Data Protection Regulation) if they have a "legal basis" (or justifiable need) for processing your Personal Data. To the extent those laws apply, our legal bases for processing Personal Data are as follows:

- To perform our obligations pursuant to a contract (or pending contract) with you. For example, we will process your Personal Data to comply with our [Terms of Use](#) to enter into a contract with you, and to honor our commitments in any contracts that we have with you.
- For our legitimate interests or the legitimate interests of others. For example, we will process your Personal Data to: operate our business and our Services; identify and fix any issues with our Services; provide customer service; secure the Services; learn more about how our customers use the Services; perform internal analytics; improve the Services and users' experiences; conduct marketing; provide you with certain information about new products, special offers or other information that we think you may find interesting using the email address which you have provided in accordance with applicable law; make and receive payments; comply with legal requirements and defend our legal rights; prevent fraud; engage in a business change (e.g., sale, merger); and to know the customer to whom we are providing Services.
- To comply with our legal obligations, such as our obligation to share data with tax authorities.

- With your consent. Where we rely on this basis, you may have the right to withdraw your consent at any time as described in the “Data Protection Rights, Information, and Choices” section below.

## COOKIES & SIMILAR TECHNOLOGIES

To collect the information in the “[Information We Collect Through Automated Means](#)” section above, we and our service providers use web server logs, cookies, tags, SDKs, tracking pixels, localstorage and similar tracking technologies. We use these technologies to improve our Services and in order to offer you as the adult a more tailored experience in the future.

- A web server log is a file where website activity is stored.
- An SDK is a set of tools and/or code that we embed in our applications and software to allow third parties to collect information about how users interact with the Services.
- A cookie is a small text file that is placed on your computer or mobile device when you use the Services, that enables us to: (i) recognize your computer; (ii) store your preferences and settings; (iii) understand the web pages of the Services you have visited; (iv), enhance your user experience by delivering and measuring the effectiveness of content and advertising tailored to your interests; (v) perform searches and analytics; and (vi) assist with security and administrative functions. Some cookies are placed in your browser cache while those associated with Flash technologies are stored with your Adobe Flash Player files.
- Tracking pixels (sometimes referred to as web beacons or clear GIFs) are tiny electronic tags with a unique identifier embedded in websites, online ads and/or email that are designed to: (1) collect usage information like ad impressions or clicks and email open rates; (2) measure popularity of the Services and associated advertising; and (3) access user cookie.
- LocalStorage is a web storage object for storing data on the client – that is, locally, on your computer. Data stored locally has no expiration date and will exist until it's been deleted.

As we adopt additional technologies, we may also gather information through other methods.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., [Internet Explorer](#); [Google Chrome](#); [Mozilla Firefox](#); or [Apple Safari](#)). Please note that by blocking, disabling, or managing any or all cookies, you may not have access to certain features or offerings of the Services.

## ONLINE ANALYTICS AND ADVERTISING

**Analytics.** We may use third-party analytics services (such as those of Google Analytics) as well as self hosted data collection services on our Services to collect and analyze usage information through cookies and similar technologies; engage in auditing, research, or reporting; assist with fraud prevention; and provide certain features to you. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-out Browser Add-on by clicking [here](#).

**Advertising.** We may work with a number of companies that assist in marketing our services to you, as the adult, on third party websites, mobile apps, and online services. These third parties may use cookies, web beacons or other tracking technologies to collect information about your use of certain parts of the Services and your activities across other websites and online services, which they may associate with persistent identifiers. Sometimes, these identifiers may be derived from a hashed or encrypted version of personal information such as your email address. We may use this information to measure the performance of our advertising as well, for instance, to evaluate which ads or content our users prefer, or which are most effective. In addition, sometimes we or an advertising partner may tailor advertising to you across different devices.

Their activities and your choices regarding their use of your information to personalize ads to you are subject to and set out in their own policies. We neither have access to, nor does this Privacy Policy govern, the use of cookies or other tracking technologies that may be placed on your computer, mobile phone, or other device

by non-affiliated, third-party providers. As described below, these providers may offer you a way to opt-out of the collection of information that is used for our interest-based advertising to you. We cannot guarantee that these instructions will not change, or that they will continue to be available; they are controlled by each third-party service provider, not us. We do not use Child Activity Information to direct or personalize advertisements, do not advertise to children, and do not present third-party advertising within the Services.

If you are interested in more information about interest-based advertising and how you can generally control cookies other tracking technologies from being put on your computer to deliver such advertising, you may visit the [Network Advertising Initiative's Consumer Opt-Out link](#), the [Digital Advertising Alliance's \(DAA's\) Consumer Opt-Out link](#), or [TrustArc's Advertising Choices Page](#). To opt out of the display of interest-based advertising from Google, please visit the [Google Ads Settings](#) page. For more information and to exercise your choices regarding Facebook and/or Instagram ads, please visit the [Facebook Ads Settings](#) page and/or the [Instagram Ads Settings](#) page.

**Notice Concerning Do Not Track.** Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our website for third party purposes, and that is why we provide the variety of opt-out mechanisms listed above. Because of the changing state of technology and indecision within the industry regarding the meaning of DNT signals, we currently do not make any guarantee that we will honor DNT signals. Learn more about [Do Not Track](#).

## HOW WE SHARE INFORMATION

We will share the information we collect from and about you in the following ways:

- **Service Providers:** We may provide access to or share your information with select third parties who perform services on our behalf, such as online hosting and maintenance, marketing and promotion design and management, management of e-commerce systems, payment processing, data storage and management, marketing and email delivery, analytics, customer service, security and fraud prevention, legal services, and identity and contact information validation.
- **Advertising Partners.** We may share information about the adult's interaction with our Services with partners in relation to personalizing advertising and integrations related to their services. To be clear, we do not share Child Activity Information with advertising partners.
- **Third Party Partners to Provide Co-Branded or Jointly Offered Products and Services.** Some of our Services may from time-to-time partner with another brand, retailer or other third party ("Partners") to offer services, products, events and promotions on a co-branded or cross-promotional basis. Your information may be collected directly by, or shared with the third party, as well as with any participating sponsors or advertisers of such Services. We will seek your consent beforehand where required by applicable law. These third parties will use your information in accordance with their own privacy policies.
- **Business Transfers:** As we continue to develop our business, we may buy, merge, or partner with other companies. In such transactions (including in contemplation of such transactions), information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third party, user information would likely be one of the transferred assets. If such transfer is subject to notifications or restrictions under applicable laws, we will comply with such requirements.
- **Comply with Laws and Protect Our Rights and the Rights of Others:** We may disclose your information when we, in good faith, believe disclosure is appropriate to comply with the law, a court order or a subpoena. We may also disclose your information to prevent or investigate a possible crime; to protect the security of the Services; to enforce or apply our online [Terms of Use](#) or other agreements; or to protect our own rights or property or the rights, property, or safety of our users or others.
- **With Your Consent or At Your Direction:** We may share information with third parties when you direct us to do so or if you have consented to additional sharing of your information (including as set out in this Privacy Policy).

A list of the operators who collect or maintain personal information from children through our Services is located [here](#).

As noted above, we do not share Child Activity Information with third parties for marketing or promotional purposes and do not advertise to children.

## **SECURITY**

We recognize the importance of implementing a variety of security safeguards designed to protect the confidentiality of your information. However, no data transmission over the Internet or other network is completely secure. As a result, while we strive to protect information you transmitted on or through our Services, you do so at your own risk.

When you create an account, you may be prompted to create a username or password. If you create an account with us, you are responsible for maintaining the confidentiality of your account password and for any activity that occurs under your account. We are not responsible for any loss or damage arising from your failure to maintain the confidentiality of your password. We urge you to change your passwords often, use a combination of letters and numbers, and make sure you are using a secure browser. If you have reason to believe that your interaction with us is no longer secure or if you suspect someone else is using your account, please let us know immediately by contacting us as indicated in the "[Contact Us](#)" section below.

## **THIRD PARTY LINKS AND FEATURES**

Please be aware that third-party websites accessible or recommended through our Services may have their own privacy and data collection policies and practices. These links and features are provided for your reference and convenience only and do not imply any endorsement of information provided through these third-party links and features, nor any association with their operators. We are not responsible for any actions, content of websites, or privacy policies of such third parties. We urge you to read the privacy and security policies of these third parties.

## **HOW LONG WE RETAIN YOUR DATA**

We will retain your information for as long as we have a business need for it or as needed to comply with applicable legal obligations. We also retain and use your information as necessary to resolve disputes, protect HOMER and our users, and enforce our agreements.

## **DATA PROTECTION RIGHTS, INFORMATION, AND CHOICES**

You may have certain rights with respect to your personal information as further described in this section, in addition to any rights discussed elsewhere in this Privacy Policy. Please note your rights and choices vary depending upon your location.

### **Marketing Communications**

You may instruct us not to use your information to contact you by email, postal mail, or phone regarding products, services, promotions and special events that might appeal to your interests by contacting us using the information in the "[Contact Us](#)" section below. In commercial email messages, you can opt out by following the instructions located at the bottom of such emails. Removing your name from the email list may take a reasonable amount of time. Please note that, regardless of your request, we may still use and share certain information as permitted by this Privacy Policy or as required by applicable law. For example, you may not opt out of certain operational emails, such as those reflecting our relationship or transactions with you.

In addition, if you consent in accordance with the [HOMER Messaging Terms & Conditions](#), you agree to receive recurring automated promotional and personalized marketing text (e.g., SMS and MMS) messages from HOMER and also agree to the [HOMER Messaging Privacy Policy](#). You can opt-out of receiving further

commercial text messages by responding to any of our text messages with any of the following replies: STOP, END, CANCEL, UNSUBSCRIBE, or QUIT.

If you no longer wish to receive push notifications to your device, you may opt out by changing your notification settings on your device or, if applicable, through the push notification service. For mobile devices, the device manufacturer, and not HOMER, controls these notification settings.

#### **Account Information.**

To keep your or your child's information accurate, current, and complete, delete your or your child's information, or restrict us from further collecting or using your child's information, please contact us through the app or at [privacy@homerapp.com](mailto:privacy@homerapp.com).

#### **Additional Choices**

You can also make certain choices by using the options described in our "Cookies & Similar Technologies" and "Online Analytics and Advertising" sections above.

#### **Rights with Respect to Your Information**

Depending on where you live, you may have certain rights with respect to your information. For example, under local laws, including in the EEA, UK, and Canada, you may have some or all the following rights:

- The right to access personal information we hold about you.
- The right to have any inaccurate personal information we hold about you corrected or updated.
- The right to object to our processing of your personal information or prevent the processing your personal information for direct-marketing purposes.
- The right to withdraw your consent at any time if and to the extent we are relying on consent as the basis for processing your personal information.
- The right to restrict the use of your personal information.
- The right to have the personal information we hold about you deleted in certain circumstances.
- The right to receive a copy of the personal information we hold about you and to request that we transfer it to a third party, with certain exceptions.

If you are a California resident, please see the "Privacy Information for California Residents" section below for information about your specific rights and how to exercise them under California law.

For residents of other jurisdictions, to exercise your data protection rights or to receive more details in connection with them, you can submit requests via [privacy@homerapp.com](mailto:privacy@homerapp.com). You may be required to provide additional information necessary to confirm your identity before we can respond to your request.

We will consider all such requests and provide our response within the time period required by applicable law. Please note, however, that certain information may be exempt from such requests, for example if we need to keep the information to comply with our own legal obligations or to establish, exercise, or defend legal claims. Your rights and our responses will vary based on your state or country of residency. Please note that you may be located in a jurisdiction where we are not obligated, or are unable, to fulfill a request. In such a case, your request may not be fulfilled.

If applicable, you may make a complaint to your local data protection supervisory authority in the country where you are based. Alternatively, you may seek a remedy through local courts if you believe your rights have been breached.

#### **Identifying the Data Controller**

Data protection laws in certain jurisdictions differentiate between the "controller" and "processor" of information. Content Media Inc. is the controller of data collected in relation to your use of the Services, such as information collected or maintained in relation to a user's account, Device and Usage Data (including, internet or other network or device activity, Services metadata, log data, location information), cookie information, and other information provided to us.



## **Privacy Information for California Residents**

### *California Privacy Rights*

Terms used in this section and not otherwise defined have the meaning given to them under the California Consumer Privacy Act ("**CCPA**").

California law requires us to provide some additional information regarding your rights with respect to your "personal information." In many cases, if you are a California resident, the CCPA allows you to make certain requests about your personal information. Specifically, unless certain exceptions apply, the CCPA allows you to request us to:

- Inform you about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information.
- Provide access to and/or a copy of certain personal information we hold about you.
- Delete certain personal information we have about you.
- Provide you with information about certain financial incentives that we offer to you, if any.

You also have certain rights under the CCPA not to be subject to certain negative consequences for exercising CCPA rights.

We reserve the right to verify your identity before responding to a request, which may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, verifying your name, email address, phone number, or other information. You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such requests or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request.

Please note that certain information may be exempt from such requests under California law. For example, we need certain information in order to provide the Services to you or to comply with legal obligations, so we would need to either reject your request to delete the information or, if we are legally permitted to delete it, we would need to terminate our provision of the Services to you after deleting it. If you would like further information regarding your legal rights under California law or would like to exercise any of them, please email [privacy@homerapp.com](mailto:privacy@homerapp.com).

### *Collection, Use, and Disclosure of Californian's Personal Information*

During the 12 months leading up to the effective date of this Privacy Policy, we collected (and continue to collect) all of the categories of information listed in the chart below and described in the "[Information We Collect](#)" section of our Privacy Policy. That section also explains the sources from which we collect information about you, including, for example, you, service providers, other users, Partners, analytics providers, cookies and tracking technologies, survey partners, and marketing partners.

The "[How We Use Information](#)" section of this Privacy Policy explains how and why we use your personal information. Generally speaking, we use your information to provide our Services, manage and verify your account, offer and personalize the Services, bill, remit, charge, and process payments, send communications, provide customer service, analyze, research, develop, and improve the Services, enforce legal terms and defend our rights, investigate and prevent security issues, fraud, and abuse, comply with laws, and as described when collecting your information.

We share certain information as set forth in "[How We Share Information](#)" section and in the chart below, and we allow third parties to collect certain information about your activity, for example through cookies, as explained in the "Cookies & Similar Technologies" section. Consistent with applicable laws, we may share Aggregate/De-Identified Information with third parties.



California residents may opt out of the “sale” of their personal information. California law broadly defines “sale” in a way that may include allowing third parties to receive certain information such as cookies, IP address and/or browsing behavior for interest-based advertising or related purposes. Although HOMER does not currently sell personal information in exchange for any monetary consideration, we may share personal information for these purposes in such a way that could be deemed a “sale” as defined by the CCPA. We also share certain information as set forth in “Cookies & Similar Technologies” section. For details on how to opt out of cookies, please see the “Cookies & Similar Technologies” section.

If you or your authorized agent would like to opt out of HOMER’s use of your information for such purposes that are considered a “sale” under the CCPA, you may do so as outlined on the following page: [Do Not Sell My Personal Information](#). Please note that we do not knowingly sell Child Activity Information or the personal information of minors under 16 years of age.

In the 12 months since the effective date of this Privacy Policy, we made the following disclosures of personal information about California residents:

Category of personal information collected by HOMER	Categories of third parties to which the information was disclosed for a business purpose
<p><b>Identifiers</b>, such as name, display name, and username.</p>	<ul style="list-style-type: none"> <li>· Service providers who perform functions on our behalf, such as data storage and hosting providers, account verification providers, email and notification providers, network and system management providers, communication tools, IT support providers, CRM providers, payment providers (“Service Providers”)</li> <li>· Partners</li> <li>· Advertising services</li> <li>· Other individuals, services, and partners at your request or with your consent</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Contact and account registration data</b>, such as name, email address, phone number, or other contact information.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Partners</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Other individuals, services, and partners at your request or with your consent</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Demographic information</b>, such as interests and dates and years of birth.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Partners</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Other individuals, services, and partners at your request or with your consent</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>

<p><b>Customer service information</b>, such as questions and other messages you address to us and summaries or voice recordings of your interactions with customer care.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Data analytics providers</li> <li>· Other individuals, services, and partners at your request or with your consent</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Inferences about your preferences and characteristics</b>, such as activity interest, hardware usage and preferences, demographics and behavioral interests.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Financial and transactional information</b>, such as billing information and financial account information (including PayPal and credit card), and information about your transactions with us.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Device information and identifiers</b>, such as IP address, browser type and language, operating system, platform type, device type, and software and hardware attributes.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Connection and usage data</b>, such as telemetry data, landing pages, browsing activity, content or ads viewed and clicked, dates and times of access, pages viewed, time spent on each page, search terms, and information about network web traffic (including traffic from a specific user).</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Geolocation data</b>, such as city, state, country, and ZIP code associated with your IP address.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
<p><b>Information provided via research, surveys, sweepstakes, and/or other marketing research efforts</b></p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Partners</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Other individuals, services, and partners at your request or with your consent</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>

<p><b>Other information</b>, such as any other information you choose to directly provide to us in connection with your use of the Services.</p>	<ul style="list-style-type: none"> <li>· Service Providers</li> <li>· Partners</li> <li>· Data analytics providers</li> <li>· Advertising services</li> <li>· Other individuals, services, and partners at your request or with your consent</li> <li>· Entities involved in actual or potential significant corporate transactions</li> <li>· Third parties for legal purposes</li> </ul>
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*California “Shine the Light” Disclosure*

The California “Shine the Light” law gives residents of California the right under certain circumstances to opt out of the sharing of certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes within the meaning of that law.

**Privacy Rights for Nevada Residents**

Under Nevada law, certain Nevada residents may opt out of the “sale” of “covered information” (as such term is defined under Nevada law) for monetary consideration. We do not engage in such activity as of the effective date of this Privacy Policy.

**PRIVACY POLICY CHANGES**

This Privacy Policy is subject to change. We reserve the right to update or modify this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. We encourage you to review this Privacy Policy frequently for any revisions or amendments. Changes to this Privacy Policy will be made accessible through use of the Services with an updated “Last Revised” date. You will be deemed to have been made aware of and have accepted the changes by your continued use of our Services.

**CHILDREN’S PRIVACY**

HOMER adheres to the Children’s Online Privacy Protection Act (“COPPA”). COPPA is a law in the United States that regulates the way in which online websites may collect and use information from children. We do not collect or use information in a manner that is inconsistent with the COPPA. For more information on the COPPA please review the [rule](#) or consult this simple [one-page informational guide](#) from the kidSAFE Seal Program.

COPPA requires that we inform parents and legal guardians about how we collect, use, and disclose personal information from children under 13 years of age; and that we obtain the consent of parents and guardians in order for children under 13 years of age to use certain features of our Services. HOMER is kidSAFE COPPA Certified. This means that the product has been independently, reviewed, and certified by kidSAFE to meet certain standards of online safety and privacy, and is authorized to display the kidSAFE Seal under kidSAFE’s FTC approved COPPA Safe Harbor program. Under the kidSAFE program users can also report concerns or complaints directly to kidSAFE through this link: [https://www.kidsafeseal.com/certifiedproducts/homer\\_learnandgrow\\_app.html](https://www.kidsafeseal.com/certifiedproducts/homer_learnandgrow_app.html)

As described in the “[Information We Collect](#)” section above, we collect Child Activity Information, device and account information, and automatically collected information while children use the Services.

As described in the “[How We Use Information](#)” section above, we use this information to: (i) measure the child’s performance in activities; (ii) adapt the learning experience to their needs; (iii) assess the child’s progress and provide reports to the relevant adults on children’s performance on activities; (iv) analyze use of

the Services and improve the content, functionality, and usability of the Services, enhance the user experience, and improve our business; (v) comply with any procedures, laws, and regulations where necessary for our legitimate interests or legitimate interests of others; (vi) understand, detect, and resolve problems with the Services and other issues being reported; (vii) comply with any procedures, laws, and regulations where necessary for our legitimate interests or legitimate interests of others; (viii) establish, exercise, or defend our legal rights where necessary for our legitimate interests or the legitimate interests of others, including the enforcement of our Terms of Use, other usage policies and agreements, and other legal terms or controls, or to engage in other legal matters; and (ix) fulfill other requests with the relevant adult's consent.

As described in the "[How We Share Information](#)" section above, we may share this information with hosting, maintenance, data storage, analytics, customer service, security and fraud prevention, and similar service providers, Partners, and others in connection with business transfers, to comply with laws, protect our rights, and the rights of others, and with the appropriate adult's consent. Our Services do not allow children to make personal information publicly available.

As stated in the "Data Protection Rights, Information, and Choices" section above, parents or legal guardians may contact HOMER to review their child's information, keep their child's information accurate, current, and complete, delete their child's information, or restrict us from further collecting or using your child's information.

### **INTERNATIONAL TRANSFERS**

Your personal information may be transferred to, stored in, accessed from, or processed in the United States or other jurisdictions in which we or our service providers maintain facilities. You understand that these jurisdictions may have different data protection regimes than in the country in which you are located.

Where legally required, we will use an adequate transfer method. For example, whenever we transfer your personal information from an entity in the EEA and UK to the United States, we may use standard contractual clauses approved by the European Commission which give personal information the same protection it has in Europe or rely on another adequate mechanism. Where applicable, you are entitled, upon request, to receive a copy of the relevant safeguard (e.g., EC standard contractual clauses) that have been taken to protect personal information during such transfer. For a copy of the relevant safeguard please contact us using the information in the [Contact Us](#) section below.

### **CONTACT US**

If you have any questions about our Services or this Privacy Policy please email us at [support@homerapp.com](mailto:support@homerapp.com) or write us:

Conscious Content Media Inc. located at 121 Varick Street, Floor 3, NY, NY 10013.

Phone: 1(800) 341-6691