

## **Walo International Limited Privacy Policy**

Effective 2/1/2011

Walo International Limited (Hereafter “walo”, “us” or “we”) provides this Privacy Policy to inform you of our policies and procedures regarding the collection, use and disclosure of information we receive from users of our application, included but not limited to BendKick, Dungeons and coins, Defender of diosa, Christmas and Coin, for handheld mobile devices (collectively, the “Application”). This Privacy Policy applies only to information that you provide to us or that we collect via the Application. Our Privacy Policy may be updated from time to time, and we will notify you of any material changes by posting the new Privacy Policy through the Application or on our company website.

### **1. Information Collection: The Information We Collect**

- When you download and use the Application, we will not collect any information that identifies you personally.
- When you download and use the Application, we may collect certain non-personal data (“Non-Identifying Information”). The type of Non-Identifying Information Walo collects includes, but is not limited to: (i) mobile device type, device identification code and device properties; (ii) geographical data; (iii) scores and achievements within the Application; and (iv) ads you click on within the Application.
- We may also permit our Advertising Display Partners (defined below under Section 3) to collect Non-Identifying Information about you while you are using the Application. Please visit our Advertising Display Partners’ websites to find their own privacy policies regarding their use of your Non-Identifying Information. Please note that some of our Advertising Display Partners may send targeted advertisements based on user behavior.

### **2. How We Use Your Information**

- We use the information we collect: (i) to provide and improve our Application, services, features and content, (ii) to administer your use of our Application, (iii) to enable users to enjoy and easily navigate the Application, (iv) to better understand your needs and interests, and (v) to provide you with further information and offers from us or third parties which we believe you may find useful or interesting, including marketing or promotional materials and other information on services and products offered by us or third parties.
- We also use information we collect to monitor and analyze use of the Application and our services and for the Application’s technical administration, to increase our Application’s functionality and user-friendliness, and to generate and derive useful data and information concerning the interests, characteristics and website use

behavior of our users.

### 3. Information Sharing and Disclosure

**Advertising Display Partners.** We will share your Non-Identifying Information with advertising service provider companies with whom we have relationships, including, but not limited to Admob, Tapjoy and Greystripe (collectively, "Advertising Display Partners"). Please visit our Advertising Display Partners' websites to find their own privacy policies regarding their use of your Non-Identifying Information. As noted above, some of our Advertising Display Partners may send targeted advertisements based on user behavior.

**Service Providers.** We may engage third party companies and individuals to facilitate our Application, to provide the Application on our behalf, to perform Application-related services (including but not limited to maintenance services, database management, web analytics and improvement of the Application's features) or to assist us in analyzing how our Application and service are used. These third parties have access to your information only for purposes of performing these tasks on our behalf.

**Compliance with Laws and Law Enforcement.** Walo cooperates with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information we have about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect the property and rights of Walo or a third party, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable.

**Business Transfers.** Walo may sell, transfer or otherwise share some or all of its assets, including your Non-Identifying Information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy.

### 4. Terminating the Collection of Non-Identifying Information

All Application users may cease the collection of their Non-Identifying Information as described in this Privacy Policy by deleting the Application from the mobile device from which they access the Application.

### 5. Links to External Websites

Our Application contains links to external websites. If you choose to visit an advertiser by "clicking on" a banner ad or other type of advertisement, or click on another third party link, you will be directed to that third party's website. The fact that we link to a website or present a banner ad or other type of advertisement is not an

endorsement, authorization or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not exercise control over third party websites. These other websites may place their own cookies or other files on your computer, collect data or solicit personal information from you. Other websites follow different rules regarding the use or disclosure of the information you submit to them. We encourage you to read the privacy policies or statements of the other websites you visit.

## 6. Security

Walo is very concerned with safeguarding your information. We employ reasonable measures designed to protect your information from unauthorized access.

## 7. Our Policy Toward Children

This Application is not directed to children under 13. We do not knowingly collect personally identifiable information from children under 13. If a parent or guardian becomes aware that his or her child has provided us with personal information without their consent, he or she should contact us at [info@walo-intl.com](mailto:info@walo-intl.com). If we become aware that a child under 13 has provided us with personal information, we will delete such information from our files.

## 8. Contacting Us

If you have any questions about this Privacy Policy, please contact us at [info@walo-intl.com](mailto:info@walo-intl.com) or at:

Walo Attn: 12/F Cameron Centre, 57-59 Chatham Road South, Tsim Sha Tsui, Kowloon, Hong Kong SAR

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