

# Jet Play Privacy Policy

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## A. Jet Play Privacy Statement

Jet Play (“*Jet Play*“, “*we*”, “*our*”, “*us*”) offers certain services such as game ideation software (the “*Services*”) to companies and businesses (“*Customers*”) that may benefit from such Services. As part of the Services we collect, use and disclose Personal Data. **Ludo.ai** is a product and brand owned and operated by Jet Play. (“Jet Play”), the legal entity responsible for all data processing activities described in this Privacy Policy. All references to “Jet Play,” “we,” “our,” or “us” in this document refer to Jet Play.

Jet Play values and respects the privacy of individuals. This Privacy Policy (“*Privacy Policy*”) describes the types of information, including Personal Data, that Jet Play collects, processes and uses as part of our websites including <https://ludo.ai> and <https://app.ludo.ai> (the “*Sites*”) and our Services. This Privacy Policy outlines individual rights regarding Jet Play’s use and disclosure of Personal Data.

As used in this Privacy Policy, the term “*Personal Data*” means information that identifies an individual, household, or place of business directly or indirectly, by reference to identifier(s) such as name, identification number, location data, online identifier or one or more factors specific to an individual’s physical, physiological, genetic, mental, economic, cultural, educational, commercial, professional or social identity.

This Privacy Policy applies to our data collection and use related to the Sites and Services. This Privacy Policy is part of our Terms of Service [<https://ludo.ai/privacy-policies>], which is incorporated by reference.

If there are questions about our privacy practices, please refer to the end of this Privacy Policy for information about how to contact us.

## B. Our Core Privacy Commitments

1. Content Ownership. We do not claim ownership of any content, ideas, designs, or assets you create using our Services. Your intellectual property remains yours.
2. Data Isolation and Privacy. Your game concepts, designs, and other content created through our Services are kept private and are not shared with other users without your explicit permission. Your data is siloed and protected.
3. No Data Selling or Model Training. We do not sell your personal information or content to third parties. Additionally, we do not use your game concepts, designs, or other content to train AI models that would make your creative work accessible to others.
4. Controlled Data Sharing. We only share your information as explicitly outlined in this Privacy Policy, primarily to provide you with our Services and as required by law. These commitments form the foundation of our approach to privacy and data protection. The following sections provide more detailed information about our specific data practices.

## C. Personal Data Collected by Jet Play

1. Types of Personal Data Collected. Jet Play collects Personal Data about individuals as described in this section. In addition to the privacy practices in this Privacy Policy, our processing of data received from certain third parties (e.g., licensors and Customers) may be further described in contracts directly with such third parties.
  - a. *Personal Data received from Licensors and Data Brokers.* Jet Play receives certain Personal Data licensed to us by third parties including data brokers. This includes name and contact information, business name and contact information, address information, state or federal identification numbers and provider information. We use the data received from these third parties as part of our Services.
  - b. *Personal Data provided by our Customers.* Jet Play collects and stores Personal Data provided to us by our Customers as part of the Services. This includes name and contact information (phone number and e-mail). We use the data received from Customers as part of our Services.
  - c. *Data available in Public Sources.* Jet Play collects certain publicly available data including data available through . This includes name and contact information. We use the data received from these sources as part of our Services.
  - d. *Personal Data Knowingly and Willingly Provided.* Jet Play collects information that individuals knowingly and voluntarily provide when using our Sites (such as through web forms or profile screens). This includes an individual's name and contact information. We primarily use this information to make inquiries and respond to requests and as part of our Services.
  - e. *Personal Data Collected by Cookies and Other Similar Technologies.* Jet Play may obtain information about individuals by installing "cookies" on their computer's hard drive. We use cookies to collect statistical information about the way visitors use our Sites including which pages they visit, which links they use, and how long they stay on each page. Jet Play also may use cookies to create a database of previous choices and preferences, saving users time and effort. More information on our use of cookies can be found in Section G(2).

#### **D. How Is Personal Data Used?**

We process Personal Data, including sharing with third parties, where processing is necessary for the purposes of our legitimate commercial interests and performance of the Services, except where otherwise required by law.

We may use or sell Personal Data we collect on its own or combine it with other information we have about an individual to:

- Achieve our business purpose in providing the Services
- To perform and improve the Services (including providing Personal Data to our Customers and other business partners);

- Perform internal operations, such as tracking and improving the effectiveness of our Services;
- Conduct research;
- Conduct audits;
- Provide information to our suppliers;
- Provide information to our representatives and/or advisors, such as our attorneys, accountants, and others to help us comply with legal, accounting, or security requirements;
- Resolve disputes between users and/or a user and the company as set forth in our Terms of Service;
- Transfer information, such as to servers outside of the United States, or as part of a merger or sale of the business;
- Protect the rights, safety, and information of our members, third parties, as well as our own. This includes fraud prevention, business or product recalls, prosecuting and defending a court arbitration or similar proceeding, and more; and
- Comply with legal requirements, such as in response to a subpoena or similar investigative demand.

Jet Play may aggregate, combine, anonymize and/or pseudonymize any data that we collect and process, including Personal Data. This may be done for the purpose of performing the Services, correcting data currently held by Jet Play, expanding data sets, research, and other data modeling.

#### **E. Who Can Access the Personal Data We Collect?**

Jet Play will only disclose Personal Data as set forth in this Privacy Policy, as permitted by law, or with your consent.

Where third parties are processing Personal Data on our behalf, they will be required to agree, by contractual means or otherwise, to process the Personal Data in accordance with the applicable law and to act only on our instructions.

Jet Play may disclose Personal Data to the following entities and for the listed purposes:

1. Customers. For the purpose of providing the Services, we share Personal Data with our Customers.
2. Employees. Only authorized employees have access to your Personal Data.
3. Service Providers. We employ other companies and individuals to perform functions on our behalf. Examples of such functions include fulfilling orders, delivering packages, sending postal mail and e-mail, removing repetitive information from customer lists, analyzing data, providing technical support, providing search results and links (including paid listings and links) and providing customer service. We may share Personal Data with these agents as we deem necessary for such third parties to perform their functions.
4. To Comply with Legal Process, Protect Company, or Enforce our Rights. We may further disclose your Personal Data when it is necessary to: (i) conform to legal requirements or comply with legal process; (ii) enforce or apply our conditions of use and other agreements;

(iii) protect the rights, safety or property of Jet Play, our affiliates, our Customers, service providers, you or the public, or (iv) prevent a crime or protect national security (including exchanging information with other companies and organizations for fraud protection and credit risk reduction).

5. As Part of a Merger or Sale of Business. We may disclose or transfer Personal Data in connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

## **F. Your Rights Regarding Personal Data and Jet Play Processes**

1. Correction & Removal. If any of the information that we have about you is incorrect, or you wish to have information (including Personal Data) removed from our records, please contact us at [privacy@ludo.ai](mailto:privacy@ludo.ai). We will respond to such inquiries within thirty (30) business days.
2. Your California Privacy Rights. California’s “Shine the Light” law (Civil Code Section § 1798.83) permits individuals with whom we have a business relationship who are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please e-mail [privacy@ludo.ai](mailto:privacy@ludo.ai).
3. Notice to California Residents. The California Consumer Privacy Act of 2018 (“*CCPA*”) provides several rights to California residents with regards to the collection, disclosure, sale, and deletion of their Personal Data. The Jet Play Privacy Notice for California Residents [<https://ludo.ai/privacy-policies>] describes in more detail Jet Play’s compliance with CCPA and how residents of California may exercise their CCPA Rights. If you have questions about exercising your CCPA Rights, please contact us as set forth in Section M.
4. Notice to Nevada Residents. We currently do not transfer personal information for monetary consideration. If in the future our approach to transferring personal information changes and you would like to tell us not to sell your information at that time please email us at [privacy@ludo.ai](mailto:privacy@ludo.ai) with your name, postal address, telephone number and email address with “Nevada do not sell” in the subject line.

## **G. Minors and Children Privacy**

Jet Play does not knowingly collect Personal Data from children under the age of 16. If we learn that Personal Data of persons less than 16 years-of-age has been collected through our Service, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child or a minor under the age of 13 has posted, submitted or otherwise communicated Personal Data to us without your consent, then you may alert us at [privacy@ludo.ai](mailto:privacy@ludo.ai) so that we may take appropriate action to remove the minor's Personal Data from our systems.

## **H. Site-Specific Terms**

1. Do Not Track Policy. Jet Play does not respond to web browser “do not track” signals on our Sites. As such, your navigation of our Sites may be tracked as part of the gathering of

quantitative user information described above. If you arrive at our Sites by way of a link from a third party site that does respond to “do not track” requests, the recognition of any “do not track” request you have initiated will end as soon as you reach our Sites.

2. Cookie Policy. When you first access the Sites, you will receive a message advising you that cookies are in use. By continuing to browse the Sites, you agree to our use of cookies as described in this Privacy Notice. If you do not wish to receive cookies, you may set your browser to reject cookies or to alert you when a cookie is placed on your computer. If you limit or disable the use of cookies when you visit the Sites, you may be unable to use the full functionality of our Sites. For more information about our specific use of cookies, please reference our Cookie Policy [<https://ludo.ai/privacy-policies>] which is incorporated herein by reference. We may also permit select third parties to use cookies to collect information about our Site visitors’ online activities across other websites or over time in order to assist us with advertising or Site analytics. The use of cookies by third parties is not covered by our Privacy Policy, as we do not have access to or control over their cookies.
3. Links to Third Party Services. Our Sites may contain links to third party websites, applications and services not operated by Jet Play. These links are provided as a service and do not imply any endorsement by Jet Play of the activities or content of these sites, applications or services nor any association with their operators. Jet Play is not responsible for the privacy policies or practices of any third party including websites or services directly linked to our Site.
4. Social Media Features. Our Sites may include social media features, such as the Facebook “Like” button and widgets, such as the “Share This” button or interactive mini-programs that run on our Sites. These features may collect your IP address, which page you are visiting on our Sites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our Sites. Your interactions with these features are governed by the privacy policy of the company providing it.

## **I. Security**

Jet Play takes the security of Personal Data seriously. We utilize industry-accepted reasonable security practices and have implemented reasonable technical and organizational measures to protect the confidentiality, security and integrity of your Personal Data. The measures we have implemented take into account the current available security technologies, cost, and risk presented by the type of Personal Data we collect, process and use.

Although we use reasonable security measures to help protect Personal Data against unauthorized disclosure or loss, we cannot guarantee the security of Personal Data transmitted to us over the Internet. While we strive to use commercially acceptable means to protect Personal Data, there is no guarantee that information may not be accessed, disclosed, altered or destroyed.

## **J. Storage and Retention**

The Personal Data that we store is generally stored on Jet Play’s servers located in the Netherlands. If you are located in another jurisdiction, you should be aware that once your Personal Data is submitted through our Service, it will be transferred to our servers in the Netherlands. We will retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal requirements.

#### **K. International Users**

We are headquartered in the United States, but Personal Data is hosted in Europe. Personal Data may be accessed by us or transferred to us in the Netherlands, or to our affiliates, partners, merchants, or service providers who are located worldwide. If you are visiting our Sites or using our Service from outside the Netherlands, be aware that your information may be transferred to, stored, and processed in the Netherlands where our servers are located, and our central database is operated. By using our Sites or Service, you consent to any transfer of this information.

We will protect the privacy and security of Personal Data according to this privacy statement, regardless of where it is processed or stored, however you explicitly acknowledge and consent to the fact that Personal Data stored or processed in the Netherlands will be subject to the laws of the Netherlands, including the ability of governments, courts or law enforcement or regulatory agencies of the Netherlands to obtain disclosure of Personal Data.

#### **L. Changes to this Privacy Policy**

Jet Play reserves the right to update or modify this Privacy Policy from time to time. If we make any material changes to this Privacy Policy or the way we use, share or collect Personal Data, we will revise the “Effective Date” at the top of this Privacy Policy and prominently post an announcement of the changes on our website prior to the new policy taking effect. The changes to the Privacy Policy will become effective within the period of time posted, but in any event a reasonable period of time. We encourage you to review this Privacy Policy regularly to ensure that you are familiar with Jet Play’s current practices.

#### **M. Privacy Inquiries**

If you have any questions or concerns about this Privacy Policy or our privacy practices please contact us as follows:

- By emailing the Privacy Department at [privacy@ludo.ai](mailto:privacy@ludo.ai)

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