

The eATLAS website, platform, and mobile application are owned and operated by Inciteful Games Holdings, LLC (referred to as Inciteful Games in this document). This Privacy Policy summarizes our privacy policy obligations and aspirations as set forth in greater detail in the Terms of Use, which control in the event of a conflict.

Our intention is always to respect your privacy on the Internet, and offer a safe and enriching online experience. Because we gather certain types of information about our users, we want you to fully understand our policy and the terms and conditions surrounding the capture and use of that information. The purpose of this privacy statement is to disclose what information we gather and how we use it.

### **INFORMATION WE GATHER AND TRACK**

Inciteful Games gathers information about users, and requests access to mobile device features, as specified below:

1. **User Information**  
Information provided by the user when signing-up for an account on our platform or application, such as name, e-mail address, mailing address, and password.
2. **System Information**  
Information on the number of downloads and the operating system from which the download occurred.
3. **Geolocation Information**  
Information on the current geolocation of the app user while they're using the app. This information is only used for the following purposes:
  - a. To make the user aware of nearby eATLAS Guided Tour or Scavenger Hunt Adventures in which they may want to participate.
  - b. Because eATLAS Adventures are active events occurring in the physical world, we need to ensure that the user is physically near the Adventure in which they would like to participate.
  - c. Because eATLAS Scavenger Hunts may include Location Objectives based on geocoordinates, we need to ensure that the user is physically near the Objective during a given Scavenger Hunt.
4. **Photo Information**
  - a. Because eATLAS Scavenger Hunts may include Photo Objectives during which the user takes a photo, we need to access the photo feature of their mobile device. Photos captured during a Photo Objective are stored only by the app and not shared, unless the user chooses to upload the photo they took to Facebook, in which case the user decides

which audience has access to that photo: all Facebook users, all of their Facebook Friends, or only the Facebook Friends they select.

- b. During eATLAS Guided Tours, users may take a photo at any Point of Interest, which are stored only by the app and not shared, unless the user chooses to upload the photo they took to Facebook, in which case the user decides which audience has access to that photo: all Facebook users, all of their Facebook Friends, or only the Facebook Friends they select.
  - c. Notwithstanding items a and b, above, Inciteful Games reserves the right to use photos uploaded by users for advertising, promotional, or other purposes.
5. Payment Processing Information
- When you purchase an eATLAS Guided Tour or Scavenger Hunt Adventure on our mobile app, you may need to provide Personal Information, such as credit card number, expiration date, and security code, to our 3<sup>rd</sup>-party payment processors.

6. Electronic Newsletter Policy

We may provide a free electronic newsletter to interested client and customer users. Inciteful Games gathers the email addresses of users who voluntarily subscribe. Users may remove themselves from this mailing list by contacting [admin@playeATLAS.com](mailto:admin@playeATLAS.com), or selecting the 'unsubscribe' option at the bottom of the newsletter email.

7. Surveys

To better tailor our content, Inciteful Games may present a voluntary survey feature to clients and customers. Any survey data captured will be aggregated and anonymized. We never share any survey data from or about specific individuals with any third party.

## USE OF INFORMATION

1. Any information voluntarily given by our users is utilized by Inciteful Games to enhance their experience with our website or application, by making our offering more personalized and interactive, or helping us better tailor future content based on the interests of our users.
2. Information that users voluntarily provide is applied in order to display information to other users and to enable users to participate in surveys, newsletters, and forums. Subscribers may receive newsletters from Inciteful Games on a regular schedule, but we will never share newsletter mailing lists with third parties, including advertisers, sponsors or partners.
3. While user information in regard to website search and application features may help us determine which areas of our sites and application features users prefer, we track the practices of our users as a group, not as individuals. Our approach in this area is motivated exclusively by our interest in improving our offering.

## SHARING OF THE INFORMATION

The information above is utilized by Inciteful Games to tailor our content to suit the needs of clients and customers, and to better understand the demographic characteristics of our audience. Except to comply with applicable law or valid legal process or to protect the personal safety of our users or the public, we will not share information about individual users with any third-party, except to make use of photos uploaded by users for advertising, promotional, or other purposes, as noted above

## INFORMATION RETENTION

1. Inciteful games retains a given user's information only while that user is active on the eATLAS App or Platform. If a given user is inactive over an eighteen (18) month period, that user's information is deleted.
2. Users are welcome at any time to contact Inciteful Games at [adventures@playeATLAS.com](mailto:adventures@playeATLAS.com) / 224-202-7536 and request the deletion of their information.

## USAGE TRACKING

1. Inciteful Games may track how users proceed through our Adventures, including time spent at each stop. We do not, however, collect individual data to pair this with or correlate this information with data about individual users. Overall usage statistics may be reviewed by Inciteful Games based on a user's domain name, browser type, and MIME type by reading this information from the browser string (information contained in every user's browser).
2. Inciteful Games may track and catalog the search terms that users enter in our application and website Search functions, but this tracking is never associated with individual users. We use tracking information to determine which areas of our site or features of our application users like and don't like based on traffic to those areas, and use of those features. We do not track what individual users read or select, but rather how well each page or feature performs overall. This helps us to build a better offering for our clients and users.

## CHILDREN

1. Consistent with the Federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly request personally identifiable information from anyone under the age of 13 without seeking parental consent.

## COOKIES

1. We may place a text file called a "cookie" in the browser files of your computer. The cookie itself does not contain Personal Information although it will enable us to relate your use of our website and app to information that you have specifically and knowingly provided. A cookie can only contain personal information which you have supplied. A cookie can't read data off your hard disk or read cookie files created by other sites.

2. You may refuse cookies by turning them off in your browser. You will receive a warning message with each cookie if you've set your browser to warn you before accepting cookies. You do not need to have cookies turned on to use our website or application. Cookies will have to be enabled, however, to participate actively in any message boards, forums, polling and surveys we administer.

## **SECURITY**

1. The data networks and technology systems operated by Inciteful Games are protected and governed by industry-standard firewall, password, and related security and privacy practices and policies. These security and privacy policies are periodically reviewed and enhanced as necessary and only authorized individuals have access to the information provided by our customers.

## **OPT-OUT POLICY**

Wherever necessary and practical we offer our users options, which include:

- Opting not to register to receive our electronic newsletters.
- Opting not to participate in certain interactive areas, which completely alleviates the need to gather any personally identifiable information from our users.

## **YOUR CONSENT**

Your use of the Inciteful Games website and application signifies your consent to the collection and use of the information as referenced above and as set forth in the Terms of Use. Changes to our privacy practices will be published in this policy statement to ensure you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.