

# Privacy Policy (Updated September, 2023)

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Sandbox Networks, Inc. ("Sandbox", "we", "us", "our"), a company within the Sandbox International Holdings Ltd operates this website ("Website") and is committed to protecting the privacy and security of its online visitors. We are also extremely sensitive to family and educator concerns about children's safety and information related to them. This privacy statement tells you about the types of information that we collect from you, how we collect that information from you and how we use that information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

We encourage our visitors to read through and understand our privacy statement. We may update it from time to time to address new issues or reflect changes on our Website. Please refer to this privacy statement regularly. Sandbox reserves the right to revise this privacy statement at any time and such revisions shall be effective immediately upon notice thereof. Notice may be given by any means including, but not limited to, posting the revised privacy statement on this Website. Any use of our site by you subsequent to such notice shall be deemed to constitute acceptance by you of such revision.

For material changes to this privacy statement that may affect the collection or use of personal information from children under the age of 13, we will notify and obtain the prior verifiable consent of a parent or legal guardian.

## **Information We Collect From You**

When you use this Website, we may collect personal information from you. Personal information means information that would identify you, directly or indirectly, such as your name, mailing address, email address, telephone number, or credit card number. Please note we do not currently collect personal information from children users. When a player creates a user account we may request that he or she creates a unique username and password and provide us with certain information, such as, gender and age.

This Website may contain blogs, bulletin boards or other public forums where free form entry is permitted. We highly recommend that you do not post your personal information when using these features. If you provide your personal information through any of these features, then such personal information will be posted publicly for others to see. We do not currently offer features that allow children to post or share personal information publicly.

We also collect anonymized information from your computer or device such as browser type, operating system, referring pages, pages visited, time spent on a particular page and IP address. An IP address is a number that is assigned automatically to your computer whenever you use the World Wide Web. Web servers -- the big computers that "serve up" Web pages -- automatically identify your computer by its IP address.

#### **How We Collect Your Information**

When you use this website, we collect personal information and anonymized information through a variety of methods.

We collect personal information from you when you interact with this Website by filling out a form such as registering for a user account, submitting a customer service request, conducting a purchase transaction, or participating in a public discussion forum.

We collect anonymized information from you by using technologies like cookies, web beacons and server logs. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of the Website. For more information on deleting or controlling cookies we recommend www.allAboutCookies.org. Please note that while browsing through this Website, you may get cookies from our advertisers or sponsors. FE does not control these cookies. The use of cookies is common in the Internet industry.

We may also use single pixels images, web beacons and other similar technology (collectively "Beacons") to (a) track your usage of the Website, (b) track response rates to certain activities and promotions within the Website and in marketing campaigns, and (c) identify certain information on how and when you accessed the Website such as type of browser, operating system, domain names, IP addresses and the like.

### **How We Use Your Information**

#### Sandbox and its affiliates may use your information described above to:

- Operate, evaluate, and improve our business (including developing new products and services; enhancing and improving our products and services; managing our communications; analyzing our products, services, and communications; and performing accounting, auditing, and other internal functions);
- 2. Process your purchase transaction (if any);
- 3. Communicate with you and respond to your inquiries;
- 4. Protect against, identify, and prevent fraud and other criminal activity and claims and other liabilities;
- 5. Comply with and enforce applicable legal requirements, relevant industry standards, and other policies; and
- 6. For our legitimate business purposes, including marketing our goods and services to you, where we have your permission to do so.

In addition, we may use information collected through automated means (cookies and/or similar technologies) for the purposes set forth above, including (i) customizing your visit to our Site, (ii) analyzing the manner in which you interact with our Site, and (iii) managing our Site and other aspects of our business. We also use information to help diagnose technical and service problems, administer our Website and identify users of our Website.

We may use the information we obtain in other ways for which we provide specific notice at the time of collection.

The anonymized information we track with cookies is not used to identify, or lead us back to, any particular visitor. Visitors to this Website may have the option of disabling cookies via their browser preferences (most browsers are initially set up to accept cookies). Cookies make our Website easier for you to use because they save your preferences while you are visiting our sites (although we do not save passwords in cookies). Cookies also help us know which areas are your favorites, which areas need improvement, and what technologies and Internet services our visitors are using. Knowing this information helps us continually improve the online experience for our visitors and members.

Sandbox may also use third party vendors who supply applications, payment processing, web hosting and other technologies for this Website that may have access to your personal information and anonymized information, but they are prohibited from using use such information for any other purpose except to provide services in connection with this Website.

Sandbox will not share any personal information about you with any third party (a party not affiliated with Sandbox International Holdings Ltd), except as otherwise stated in this

Privacy Statement and in the following circumstances: (a) in response to subpoenas, court orders or legal process, to the extent permitted and as restricted by law; (b) when disclosure is required to maintain the security and integrity of this site, or to protect any user's security or the security of other persons, consistent with applicable laws; (c) when disclosure is directed or consented to by the registered member who has inputted the personal information; (d) in the event that Sandbox International Holdings Ltd or any of its subdivisions or units goes through a business transition, such as a merger, divestiture, acquisition, liquidation or sale of all or a portion of its assets, your personal information will, in most instances, be part of the assets transferred; or (e) in limited circumstances, Sandbox may disclose your email address in order to comply with laws and regulations, including the Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM of 2003).

#### **Do Not Track**

This Website does not respond to your browser's (or app's) "do-not-track" signals or comparable signals or mechanisms. Please check our Privacy Statement frequently as this may change in the future.

### **Children's Privacy**

Sandbox encourages parents and guardians to supervise their child's use of the internet. We urge parents to instruct their children to never give out their real names, addresses, phone numbers, or other personal information without a parent's or guardian's permission when using the Internet. We recognize a special obligation to protect personal information obtained from children. For this reason, Sandbox does not request, collect, or store any personal information knowingly from children under 13.

As a parent, you've probably done a lot of thinking about protecting your family's privacy on the internet. We have been thinking and working hard to provide you with the best information and the highest quality interaction on the internet in an environment that is safe. In compliance with COPPA (the Children's Online Privacy Protection Act), we have adopted the following policies to keep kids safe (there are exceptions to these policies as noted below under the heading "Exceptions to Verifiable Parental Consent and Information Collected from Children"):

- We will NOT knowingly collect, use, or distribute personal information from children under the age of 13 without prior verifiable consent from a parent or guardian.
- Personal information we collect from children under the age of 13 will be used solely by Sandbox or its agents for internal purpose only and will NOT be sold or otherwise distributed to third parties.

- We will NOT knowingly allow children under the age of 13 access to free form chat, message boards, email accounts, or other services within Sandbox that would allow them to publicly post or otherwise distribute personal information without prior verifiable consent from a parent or guardian.
- We will NOT knowingly keep any personal information that is inadvertently included in a child's email submission, help inquiry, or other one-time request, if we know that the child is under the age of 13. Any such information will be purged promptly after the issue has been resolved.
- We will NOT knowingly post any personal information that is inadvertently included in a child's submission to a general audience contribution area if we know that the child is under the age of 13. Upon notice to us, these submissions will be deleted and handled anonymously thereafter.
- We will NOT knowingly provide any direct link to websites that are unsuitable for children or teens. We will advise children under the age of 13 that they MUST obtain permission from their parent or guardian before sharing ANY personal information. Upon request, Sandbox will provide a parent or guardian with a description of the information that may have been provided about their child during a registration process for a program or service of this site. Sandbox only asks for a child's or teen's personal information if it is necessary to participate in an activity, game or service. If we have collected and stored personal information from a child, we will give parents the ability to review their child's personal information, request that we discontinue further collection or use of their child's personal information, and/or request that we delete their child's personal information. If a parent wants to confirm that we have not collected any personal information from their child or exercise any other rights under COPPA, the parent can contact us and send requests or questions to us using this form.

#### **Notification and Verifiable Parental Consent**

Before any personal information is collected from a child under the age of 13, we will use reasonable efforts to notify the parent or guardian that their child is participating. Notification will include the exact nature and intended use of the information we are collecting, as well as the opportunity for the parent or guardian to prevent the use of the information and the child's participation in the activity. For every child under the age of 13, we will also require the parent or guardian to provide verifiable parental consent such as: by email plus a fax, phone or letter follow up by the parent or guardian; mail, fax or scan of a consent form; or phone call to Sandbox; or other acceptable method.

In order for us to provide notice to a parent or guardian and seek verifiable parental consent, we may request the online contact information of a parent or guardian.

# Exceptions to Verifiable Parental Consent and Information Collected From Children

In the following instances we will NOT get verifiable parental consent for the collection of a child's personal information:

- Collecting a child's contact information solely to directly respond to the child's request on a one-time basis (for example, to provide assistance with a particular customer service question). We will not use that information to re-contact the child for any other purpose (we will purge from our system the child's personal information after responding);
- Collecting a child's contact information and the contact information of his/her parent or guardian solely to directly respond more than once to a specific request from the child (for example, to satisfy the request for a newsletter subscription). In this instance, the parent or guardian will be notified that the child made such a request and be informed of the information provided by the child. The parent or guardian will have an opportunity at any time to revoke the child's request (i.e., unsubscribe). We will not use the child's personal information to re-contact the child for any other purpose.
- Using persistent identifiers on our Website to support the internal operations of our Website which include: maintaining and analyzing the functioning of the Website; performing network communications; authenticating users; personalizing content on the Website; serving contextual advertising or capping the frequency of advertising; protecting the security or integrity of the user, Website or service; and to ensure legal and regulatory compliance. A "persistent identifier" is a series of numbers that we assign to a user but cannot be reasonably used to identify a specific user.
- A child may provide the email address of their parent or guardian for the purpose of retrieving or resetting a child's lost password for their user account.

#### **About Our Advertisers**

This Website allows advertising by third parties. Sandbox does not control the linking practices of advertisers or sponsors and does not monitor or claim responsibility for any content or privacy practices of such websites. Once you have clicked on an advertisement and have left this Website, you must read the privacy policy of the advertiser or sponsor to see how your information will be handled.

Sandbox may offer contests, sweepstakes, and promotions that are sponsored by third-party advertisers or sponsors. These third parties may obtain personal information that visitors voluntarily submit to participate in the activity. Sandbox does not control the third parties' use of information.

Sandbox may use advertising servers developed by third parties to display ads on this Website. Some of these ads may contain cookies that are set by third parties (advertisers, sponsors) and may use anonymized information (not including your name, address, email address, telephone number) about your visits to this and other sites in order to provide advertisements about goods and services of interest to you. We do not have access to these cookies or any information that they transmit. The Sandbox privacy statement does not cover any use of information that a third-party ad server may have collected from you.

For more information on ad serving, please go to http://www.allaboutcookies.org/adserving/. If you would like to know your choices about not having information used by these third parties, please go to:

http://www.networkadvertising.org/understanding-online-advertising/what-are-my-options.

#### **A Notice About External Links**

Occasionally, you will find links from Sandbox to independently owned, controlled, and/or managed Websites whose content we believe will be of possible interest and value to our visitors. Additionally, you'll see links from advertisers, sponsors, and other partners who may use a Sandbox owned logo as part of a co-branding agreement.

In many cases, these links represent cooperative projects or mutual links established with the organizations connected with these sites. We do not control the content of these links. These other sites may send you their own cookies, collect data, or solicit personal information. While we identify sponsor and advertiser areas of our Websites, we do not control these cookies or the content of these third parties.

Sandbox has partnered with other companies to provide certain services. In some cases, you may see a Sandbox owned logo on another company's site. Sandbox does not share any of your personal information with these partners and they do not share any information with us.

Once you leave our servers (you can generally tell where you are by checking the URL in the location bar on your browser), the use of any information collected from you is governed by the privacy policy of the operator of the site you are visiting. That policy may differ from ours. If you cannot find the privacy policy of any of these sites via a link from that site's Home page, you should contact the site directly for more information.

We specifically recommend that children check with their parents, guardians, or teachers before connecting to any third party sites.

## **Security**

Sandbox has security measures in place to protect the loss, misuse, and alteration of the information under our control. Essentially, we encrypt all transmission of sensitive data and secure all of our repositories of data. The data transferred to our third party payment processors when you use your credit card to make a purchase transaction with us will be transferred using our encrypted technology to safeguard your personal information and privacy. However, you should understand that "perfect security" cannot be guaranteed.

# Individuals Located in the European Union: Your Rights and Choices

If you are a resident of the European Union or provide personal information through this Website while located in the European Union, the below provides additional information affecting your rights and choices.

If you are a resident of the European Union or provide personal information through this Website while located in the European Union, we offer you certain choices in connection with the personal information that we collect from you on this Website.

Users in the European Union may have the right under certain circumstances:

- to be provided with a copy of your personal information held by us;
- to request the rectification or erasure of your personal information held by us;
- to request that we cease processing your personal information;
- to request that we restrict the processing of your personal information (while we verify or investigate your concerns with this information, for example);
- to request that your data be transferred to a third party.

You can exercise the rights listed above at any time by contacting us as indicated in the "How To Contact Us" section of this privacy statement. We will apply your preferences going forward. You agree that if you exercise any of the rights listed above (except to receive a copy of your personal information), you may no longer and will no longer access the Website, and we will no longer provide any services associated with the Website (if any) to you.

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority, (to locate your data protection authority see <a href="http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.html">http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.html</a>).

## **Residents of California: Your Rights and Choices**

If you are a California resident, we process your personal data in accordance with the California Consumer Privacy Act (CCPA), effective January 1, 2020. This section of our Privacy Policy contains information required by the CCPA.

For information about the categories of sources from which we obtain personal information, or for additional details about the specific types of personal information we collect, please refer to the "Information We Collect From You" section of the Privacy Policy. For information about our purpose(s) for collecting, or possibly sharing your personal

information, please refer to the "How We Use Your Information" section of the Privacy Policy.

We may have collected the following categories of personal information in the past 12 months:

- Identifiers such as contact information, name, email, or IP address.
- Commercial information such as transaction history if you have created an account or purchased from us.
- Device, usage and internet or other electronic network activity information such as information about your device type, browser settings or interactions with our sites.
- Geolocation data.
- Inferences about your preferences and interests from data we collect in order to provide and personalize our services and tailor the offers we and our partners provide to you.

We disclose the following types of personal information with third parties for business or commercial purposes:

- Identifiers
- Commercial information
- Internet activity
- Geolocation data
- Inferences

In addition, we may collect, use and disclose your personal information as required or permitted by applicable law, or as directed by you, in accordance with this Privacy Policy.

We do not knowingly "sell" personal information that we collect from you, in accordance with the definition of "sell" in the CCPA.

California law grants certain rights to California consumers. These include the rights to:

- Access specific pieces of personal information
- Learn about how we process and share personal information
- Request deletion of personal information
- Opt out of "sales," as that term is defined under California law
- Not to be denied goods or services for exercising these rights

You may exercise your right to opt out of "sales" by clicking this link and following the instructions: CA Residents: Do Not Sell My Info. To exercise your other rights under California law, please contact our customer service using the information in the "How to Contact Us" section of the Privacy Policy. Please note that we will need to verify your identity before completing your rights request.

## **Cross-Border Transfer of Data**

Any personal information you provide to Sandbox in connection with this Website will be stored on Sandbox's servers or those of its affiliates and/or authorized vendors and will be accessible by authorized employees, agents and contractors of Sandbox and its affiliates and authorized vendors. Due to the global nature of the Website, personal information may be transmitted, stored or processed in a country other than the one in which you reside ("Resident Jurisdiction"), including primarily in the United States, the European Union and India. Reasonable contractual or other measures Sandbox may take to protect your personal information while outside the Resident Jurisdiction are subject to applicable foreign legal requirements, for example, lawful requirements by governmental authorities or court order to disclose personally identifiable information to government authorities in the countries in which such data may be stored or processed. SUBJECT TO APPLICABLE LAW, IF YOU RESIDE IN THE EUROPEAN UNION, CANADA OR OTHER JURISDICTION WITH SIMILAR DATA TRANSFER REGULATIONS, BY ACCEPTING THE TERMS OF THIS AGREEMENT, YOU EXPLICITLY CONSENT THAT THE PERSONALLY IDENTIFIABLE INFORMATION YOU PROVIDE MAY BE TRANSFERRED AND STORED IN COUNTRIES OUTSIDE THE EU, CANADA OR YOUR RESIDENT JURISDICTION, INCLUDING THE UNITED STATES, IN CONNECTION WITH THE TERMS OF USE, THIS PRIVACY STATEMENT, AND IN ORDER TO PROVIDE SERVICES TO YOU. IF YOU DO NOT CONSENT. PLEASE DO NOT PROVIDE US WITH ANY PERSONAL INFORMATION. YOUR PERSONAL INFORMATION SHALL ONLY BE USED IN ACCORDANCE WITH THE TERMS OF THIS PRIVACY STATEMENT.

#### **How to Contact Us**

If you have any questions or concerns about this privacy statement or your dealings with Sandbox, or if you would like us to update information that we have about you or your preferences or consents, please:

- 1. E-mail us at: Customer Support;
- 2. Write to us at: Sandbox Networks, Inc., PO Box 51660, Boston, MA 02205; or
- 3. Call us at: 1-800-498-3264

# **Flashcards**

Hone your math skills with our flashcards!



# **New Games**

Discover several new games that we've added to our collection!

**PLAY GAMES** 

# Hangman

Grow your vocab the fun way!



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