

Harmony Apps Limited

PRIVACY POLICY

This Privacy Policy (“Policy”) describes how Harmony Apps Ltd. and its related companies (“we,” or “us,” or “Company”) collect, use and share personal information of users of the Rocka mobile application (“Rocka” or the “App”), this website (the “Site”) and other services provided by the Company (the App, the Site, and such services shall be collectively referred to as the “Service”). This Policy also applies to any of our other mobile applications or websites that post this Policy. This Policy does not apply to websites that post different statements.

WHAT WE COLLECT

We get information about you in a range of ways.

- **Information You Give Us.** We collect information you directly give us, such as your name, email address, phone number, password, login credentials to your social network accounts, and demographic information.
- **Information That Is Aggregated.** “Aggregate data” are data we collect about a group or category of features, services or individuals, from which individual identities have been removed. For example, information about how you use a feature may be collected and combined with information about how others use the same feature, without any personal information included in the resulting data.
- **Information We Get from Others.** We may get information about you from other sources. We may add this to information we get from the Service. We allow you to access third party services, such as Facebook and Twitter, to import information about who you are connected with on those other services so you can connect with them on the Service. Some of those third party services may also provide us with information from your accounts there to enhance and personalize your use of the Service; you may modify your privacy settings with those other services directly.
- **Information Automatically Collected.** We automatically log information stored in your phone, such as advertiser ID, phone brand and model, and default language, (b) your login information (either through email or Facebook), and (c) your approximate location (via IP address).
- **Cookies.** We may log information using "cookies" for the sole purpose of improving our Service. Cookies are small data files stored on your hard drive by a website. Cookies help us make our Service and your visit better. We use cookies to see which parts of our Service people use and like and to count visits to our Service.
- **Public Content.** You can contribute to the Service in a number of different ways that are intended to be viewed by other users, including writing reviews, uploading videos and photos, participating in forums, tagging products, filling out your public profile, and voting on other users’ contributions. We may store these contributions (your “Public Content”), display them to other users, and use them for promotional purposes. Note that if you include personally identifiable information in your Public Content, it can be used and viewed by others. We are not responsible for the information you choose to include in your Public Content.

HOW WE USE PERSONAL INFORMATION

We use your personal information for the following purposes:

- To operate, maintain, and improve our products, and services.
- To analyze your usage of the App for the purpose of improving our App.
- To provide custom, personalized advertisements, content, and information.

- To monitor and analyze usage and trends, and to personalize and improve ROCKA and your experiences when you use ROCKA.
- To respond to comments and questions and provide customer service.
- To send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.
- To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.
- To communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners. The legal bases for our processing of your personal information are (a) our obtaining your consent for the processing of your personal information for the foregoing purposes, and (b) the fact that such processing is necessary for us to render the Service. We retain your personal information to provide the Service to you and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements; otherwise, we will delete your personal information immediately after you terminate your account.

SHARING OF PERSONAL INFORMATION

In certain circumstances we may share your personal information with third parties without further notice to you, unless required by the law, as set forth below:

- With companies who may offer you products and services. You may opt out of this sharing by contacting us via the channel listed in the “Contact Information” below.
- With certain social networking services, if you allow such sharing through our services.
- With your consent. For example, you may let us share personal information with third parties for their own marketing uses. Those uses will be subject to the privacy policies of such third parties.
- With those who provide services to ROCKA, such as sending ROCKA email communications, managing ROCKA marketing campaigns.
- With educational institutions and other third parties for research purposes.
- In order to help provide the Service at no cost to you, we may sell or license to third parties Voice Recordings that have been stripped of information that could identify you directly (such as your name and contact information).
- For legal, protection, and safety purposes:
 - To comply with laws.
 - To respond to lawful requests and legal processes.
 - To protect the rights and property of ROCKA Corp. our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use.
 - In an emergency. This includes protecting the safety of our employees and agents, our customers, or any person.

If and when we negotiate a transaction involving the sale or transfer of all or a part of our business or assets. These transactions can include any merger, financing, acquisition, or bankruptcy transaction or proceeding.

If you post Public Content on the Site or the App, we may distribute such Public Content to a wider audience by sharing it (or portions of it) with third parties so that they can publish it on their own websites and media platforms. We allow you to access third party services, such as Facebook and Twitter, to share your selected Public Content with those services.

We may share aggregate data with interested third parties to assist them in conducting research, developing new products, and understanding the interest and usage patterns for certain information, products, services, data, content, services, advertisements, promotions, and/or functionality on the Service.

RETENTION OF PERSONAL INFORMATION

We will retain your personal information for as long as your account is active, and as long as is reasonably necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

YOUR PRIVACY RIGHTS AND CHOICES

You have certain rights and may make certain choices regarding our processing of your personal information:

- You may request access to, correction of, or erasure of your personal information by going to hello@rocklearning.com
- You may request that we restrict processing of your personal information or object to our processing of your personal information by contacting our Data Protection Officer, in which case you will no longer be able to have an account with ROCKA.
- You may request that (a) we provide you with your personal information in a structure, commonly used and machine-readable format, and (b) we transmit your personal information to a third party, by going to hello@rocklearning.com. This is referred to as “Data Portability.”
- You may withdraw your consent at any time by deleting your account with us.
- If you reside in the EEA, you have the right to lodge a complaint with the supervisory authority of your member state. For a list of supervisory authorities, please see http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm
- You are not obligated to provide any personal information, but (a) if you do not provide your email address, we will not be able to communicate with you.
- Our marketing emails tell you how to “opt-out.” If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you.
- You may send requests about personal information to our Contact Information below. You can request to change contact choices, opt-out of our sharing with others, and update your personal information.
- You can typically remove and reject cookies from our Service with your browser settings. Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how our Service works for you.

ADVERTISING AND REMARKETING

We may allow other companies, called third party ad servers or ad networks, to serve advertisements within the Site or the App. These third party ad servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on the Site. They automatically receive your IP Address when this happens. They may also use other technologies (such as cookies, JavaScript, or web beacons) to measure the effectiveness of their advertisements and to personalize their advertising content. Further, these advertisers may also serve ads to you on other websites (including ads for our products and services) based on information collected from you while using the Site. For example, we may use Google’s “remarketing” service to target our ads to you based on your prior use of the Site or the App when you visit on other sites in Google’s content network.

You should be aware that advertisers may target advertisements to users based on certain user characteristics. If you respond to this type of targeted advertisement, the advertiser or ad server may conclude that you fit the description of the audience they were trying to reach. Our Privacy Policy does not apply to, and we cannot control the activities of, such ad servers, ad networks, or their advertiser clients.

LINKS TO OTHER SITES

The Site may contain links or references to external websites. These are provided for your convenience only, and we do not have control over the privacy or security practices and policies of third party sites. Any personal information you provide on linked pages is provided directly to that third party and is subject

to that third party's privacy policy. Please learn about the privacy and security practices and policies of external websites before providing them with personal information.

CHILDREN

Consistent with the federal Children's Online Privacy Protection Act of 1998 (COPPA), we do not knowingly collect personally identifiable information from anyone under the age of thirteen (13) without parental consent. Any person who provides their personal information to us through the Site represents that they are 13 years of age or older. We ask for and store users' date of birth to ensure they are 13 or older, but do not share that information unless the user chooses to share it on the user's profile. If you believe that we have collected information from an individual under the age of 13, please contact us so that we may take appropriate steps to address the issue.

SECURITY OF YOUR PERSONAL INFORMATION

We implement a variety of administrative, managerial, and technical security measures to help protect your personal information. Our Company has various internal control standards which relate specifically to the handling of personal information. These include certain controls to help safeguard the information we collect online. Our employees are trained to understand and comply with these controls and we communicate our Privacy Policy, practices and guidelines to our employees. However, while we strive to protect your personal information, you must also take steps to protect your information. We urge you to take every precaution to protect your personal information while you are on the Internet.

If you are a resident of the European Economic Area (EEA), or are accessing this Site from within the EEA, you have certain rights with respect to your data. We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to hello@rocklearning.com

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information.
- If you request that your account be deleted, you will lose access to all of our programs in which you are actively registered.
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.
- Opting out from receiving marketing communications that we send you at any time. You can exercise this right by selecting the "unsubscribe" or "opt-out" link in the marketing emails we send you. Additionally, you may update your email preferences by changing the settings in your account.
- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available [here](#).

CONTACT INFORMATION / DATA PROTECTION OFFICER

If you have questions, comments or complaints about this Privacy Policy or our privacy practices, or would like to exercise any of your rights and choices under this Privacy Policy or applicable law, you may contact our Data Protection Officer at the following email address: hello@rocklearning.com

CHANGES TO THIS PRIVACY POLICY

We may occasionally update this Privacy Policy. When we do, we will also revise the "updated date" on the Privacy Policy. For changes to this Privacy Policy that may be materially less restrictive on our use or disclosure of personal information that you have provided to us, the new policy will not apply to information collected prior to the change unless we obtain your consent. We encourage you to periodically review this Privacy Policy to stay informed about how we are protecting the personal information we collect. Your continued use of the Service constitutes your going forward agreement to this Privacy Policy and any updates.

This privacy policy was last updated on December 1, 2020.