

AppsFlyer Privacy Statement for Kids Apps

Last updated date: March 2023

Introduction to AppsFlyer Services

At AppsFlyer, data privacy is at our core. We strive to be at the forefront of the industry's privacy standard and work to pave the way for heightened security and privacy standards most specifically towards children facing apps.

AppsFlyer provides a cloud-based software-as-a-service that enables customers to store, manage, analyze, measure and control their own data (the **"Service"**). By using AppsFlyer, customers are able to measure their marketing efforts, analyze their app usage, improve app users' experience, collaborate with their partners and leverage fraud protection technologies while preserving the privacy of their users.

AppsFlyer offers its Service globally and across multiple platforms, including iOS, Android, Windows and CTV. As a result, AppsFlyer's Service is designed to be highly flexible and configurable to allow its customers to utilize its services based on their particular business needs and compliance obligations.

Depending on the nature of the Customer's online service, it may be directed to children. AppsFlyer provides a wide range of controls and tools to enable Customers to remain compliant with the various global child data protections laws and platform rules. Please see our full online guide describing each solution and its technical implementation guidelines [here](#).

This document provides specific information in relation to the use of AppsFlyer's services by customers with apps that are directed to children or a mixed audience. To review how we process data when customers use our service in general please [click here](#). To view our privacy policy in relation to AppsFlyer's publicly accessible website or marketing activities please [click here](#).

Compliant onboarding for child-directed and mixed audience Apps

When adding an app with the AppsFlyer Service, Customers are asked to flag their app as directed to children, meaning their app includes children as all, or part of their audience. At that time, Customers are also asked to confirm that the guiding documentation has been read and that the appropriate controls will be implemented. Customers will receive a follow-up message within two weeks of the app creation and will have a month to confirm that the appropriate controls have been implemented.

If Customers fail to implement the controls, where appropriate, steps may be taken to suspend the account.

Please see the AppsFlyer [Terms and Conditions](#) or refer to the Agreement that governs the provision of Service by AppsFlyer and their use by Customers for further information.

Kids Privacy Assured by PRIVO: COPPA Safe Harbor Certification & GDPRkids™

AppsFlyer Ltd. (measurement solution for child directed apps) is a member of the PRIVO Kids Privacy Assured Program (“the Program”) for COPPA Safe Harbor Certification and GDPRkids™. PRIVO is an independent, third-party organization committed to safeguarding children’s personal information collected online.

[COPPA Safe Harbor Certification](#)



The Program certification applies to the digital properties listed on the validation page that is viewable by clicking on the PRIVO COPPA certification Seal. The certification Seal posted on this page indicates AppsFlyer Ltd. has established a COPPA compliant solution and has agreed to submit to PRIVO’s oversight and consumer dispute resolution process. If you have questions or concerns about our privacy practices, please contact us at privacy@appsflyer.com. If you have further concerns after you have contacted us, you can contact PRIVO directly at privacy@privo.com.



The Program applies to the digital properties listed on the validation page that is viewable by clicking on the PRIVO GDPRkids™ Verified Shield. The PRIVO GDPRkids™ Privacy Assured Program supports child directed services known as Information Society Services under the General Data Protection Regulation (GDPR), to comply with the requirements of this legislation. It impacts any child directed service in an EU Member State and any service globally that collects and or processes the personal data of children and minors. There is no safe harbor for the GDPR to date, but to ensure this company's services meet the program requirements, we conduct regular monitoring and consulting.

Information processed

Information processed by AppsFlyer will vary depending on the configuration and controls [implemented](#) by the customer. This information is used solely to provide the Service as required.

The personal data types that may be received and processed by AppsFlyer when customers use the service include a the following:

- **Identifiers:** unique identifiers that can identify a computer, device, browser or application.
 - IDFA, Android ID, Google Advertiser ID, Customer issued user ID and other similar unique identifiers
- **Network Based Identifier:** IP Address (which may be resolved to coarse IP based geolocation information such as country/region/city)
- **Engagement Information:** information relating to the Customer's ad campaigns and End User actions.
 - clicks on Customer ads, ad impressions viewed, audiences or segments to which an ad campaign is attributed, type of ads, app launches, type of ads and the webpage or application from which such ads were displayed, pages on Customer's website or application visited by the End User, referral URL,

downloads and installations of applications including date, other interactions, events and actions Customers choose to measure or analyze (add to cart, in-app purchases, clicks,

AppsFlyer may also process the following non-personal information (when on its own) depending on the controls implemented:

- **Technical Information:** information related to an End User's mobile device or computer
 - *browser type, device type, model, CPU, system language, memory, OS version, Wi-Fi Status, battery status, time stamp zone, device motion parameters and carrier and other similar device or network related data*

To learn more on how we process data when customers use our service please [click here](#)

Disclosure

AppsFlyer does not share, sell or disclose information with any third party, except:

1. Upon our Customer's request - this includes enabling Customers to collaborate with their various partners and to share certain data with them through the service ;
2. Internally to our subsidiaries and global branches as necessary to help us support and maintain the Service provided to Customers;
3. To our subprocessors who help to support our Service - such as data hosting providers
4. When legally required (e.g. court orders or other lawful requests by public authorities), including to meet national security or law enforcement requirements;
5. To respond to, or prevent, fraud or to protect the safety of AppsFlyer, its Customers, End Users or the public;
6. As part of any merger or acquisition of AppsFlyer, in which case End User Data may be transferred to the surviving or acquiring entity.

End Users should visit the app's specific privacy policies to learn how the app uses and shares information.

Review and Delete

Parents and End Users can review and request the deletion of any personal information that is processed by AppsFlyer to provide the Service and can refuse to permit further collection or use of the child's information. Please contact the specific Customer (app owner) operating the online service that has implemented the AppsFlyer Service, in accordance with the Customer's online privacy policy and AppsFlyer will work with such customer to ensure your request is fulfilled.

Contact Us and Additional Information

For any questions relating to our privacy practices or to contact our data protection officer please send us a mail to: dpo@appsflyer.com. You may also send us or our data protection officer regular mail:

AppsFlyer – Attn: Legal Team/Data Protection Officer,
14 Maskit St.
Herzliya, Israel
4673314

For the purposes of Article 27 of the General Data Protection Regulation, the representative within the EU of AppsFlyer is AppsFlyer Germany GmbH, Schönhauser Allee 180, 10119 Berlin (contact privacy@appsflyer.com; +49 30 166373500)

For more information on how AppsFlyer processes data when customers use AppsFlyer please [click here](#).