

Privacy Policy

Introduction

This policy governs any kind of processing (including collection, use, transfer, storage and deletion) of personally identifiable information (any information that may be used to identify a physical person, and any other information associated therewith) about natural persons, which are either consumers of YOUTOBIA® products or services, or representatives of our cooperation partners (“personal data”), by all business units and entities within the YOUTOBIA. This policy applies to our processing of personal data collected through any means, actively as well as passively, online as well as offline, from persons located anywhere in the world. Any question regarding our processing of personal data may be directed to:

General principles

Generally, the YOUTOBIA will be guided by the following principles when processing personal data:

1. We will only collect personal data for specific and specified purposes;
2. We will not collect personal data beyond what is necessary to accomplish those purposes;
3. We will not use personal data for purposes other than that for which the data was collected, except as stated herein, or with prior consent;
4. We will not transfer personal data to third parties or across borders, except as stated herein, or with prior consent;
5. We will seek to verify and/or update personal data periodically, and we will accept requests for amendments of personal data;
6. We will apply high technical standards to make our processing of personal data secure;
7. Except when stated herein, we will not store personal data in identifiable form longer than is necessary to accomplish its purpose, or as is required by law.

YOUTOBIA encourages families to visit our YOUTOBIA.com sites together as a shared activity.

Transfer of personal data to third parties and/or other countries

As a general principle, we process personal data in order to facilitate or improve the YOUTOBIA’s offerings and services to you. We do purchase supplementary data from public sources to complement our data bases.

We do not process personal data on behalf of third parties, nor do we sell personal data to, or share personal data with, third parties for their own, independent use, except if you allow us to do so.

We do share personal data with third party vendors when it is necessary to provide services that we don’t perform ourselves, e.g. shipping of YOUTOBIA® products, mailing of YOUTOBIA® Newsletter, etc.

We also use third party data hosting companies to store personal data collected by us in their servers, and to do data validation checks for us (see YOUTOBIA ID - Linked Accounts below).

We undertake or commission consumer research projects from time to time and we may share personal data with third party research companies for this purpose. Also, such third party research companies may host survey data in their data bases on our behalf.

All data transfers to third party vendors or partners, including those listed as examples above will be subject to a written contract between us and the third party vendor or partner in question, and the vendor or partner will not have any authority to use such personal data for any purpose other than as instructed by us.

When relevant, personal information may be shared among the business units and entities inside the YOUTOBIA entities.

We will disclose personal data when legally obligated to do so under subpoena or court order, or for law enforcement purposes. For operational security reasons, we process (mirror) personal data in Europe, Asia and the United States. This means that all personal data processed by us is transferred between our facilities in Europe, Asia and the United States periodically.

Personal data collected online from children under the age of 13

When a child under the age of 13 (or such higher age as may be determined by local law; in the following, the age 13 is used as the common denominator for easy reference) contacts the YOUTOBIA online, for example to participate in a contest or to ask a question, we will collect that child's email address and the e-mail address of the child's parent or guardian. We will use the child's e-mail address only for the purpose for which it was collected, and we will use the e-mail address of the parents or guardians only to provide notification about the child's contact with us, and to provide notification of the types and uses of personal data collected, if and as required by law.

We cannot and will not establish conditions that will require or encourage children to disclose personal data over and above what is reasonably necessary to participate in any activity features on our web sites.

Children under 13 years of age are allowed to participate in contests. However, if such a child wins, notification will be sent to the parent or guardian's e-mail address (provided by the child when he/she enters the contest). Also, we will not ask the child for any personal data beyond e-mail addresses without obtaining prior parental consent. Any personal data obtained from children and parents during contests will be kept until the contest ends and prizes are delivered, and then it will be deleted.

If any online activity offered by us will allow children under the age of 13 to reveal personal data publicly (for example via un-moderated chat rooms or bulletin boards), we will obtain parental consent before allowing the child to participate. Currently, all such activities are moderated, monitored and/or screened.

Processing of personal data through YOUTOBIA® channels

YOUTOBIA ID

General:

We have introduced one common profile platform (YOUTOBIA ID) which is usable across different YOUTOBIA online applications. When you have created one YOUTOBIA ID for one application, it can be used for other applications as well.

A YOUTOBIA ID may be created by children and adults alike, but where an individual younger than 13 signs-up, we will, as a general rule, collect personal data from the parents or legal guardian of the child rather than the child.

In order to create a YOUTOBIA ID, we will process personal data such as email address (and a parent or legal guardian email address if the creator is under the age of 13), birthday, country of residence, and gender. We will also require a password and a username to be created.

The email address is used for sending account notifications and other system-related information as needed.

Linked Accounts:

By linking children's YOUTOBIA ID's with parents or legal guardians YOUTOBIA ID's, we enable more substantial parental control over the child's online activities (e.g. in regards to the YOUTOBIA Universe game). In doing so, however, it is extremely important that we can verify the relationship between the child and the parent or legal guardian to whose YOUTOBIA ID the child's YOUTOBIA ID is to be linked.

For this reason, we will process personal data in regards to the parent or legal guardian such as first and last name, mailing address, date of birth and a more reliable type of offline ID number (e.g. driver's license number or social security number, personal identification number or the like) varying by jurisdiction.

We will transfer these data to an external service provider, which will perform the validation for us. Validation services will be performed under a written contract between us and the service provider.

We will not store personal data collected for the validation in our archives. The result we receive back will be a "match" (in which case the child and the parent or legal guardian YOUTOBIA ID's will be linked) or a "no match" (in which case the YOUTOBIA ID's will not be linked, until and unless an appropriate relationship between the child and the applicant has been established otherwise).

The external service provider will process and store the personal data submitted by us strictly for documentation purposes.

YOUTOBIA Membership

When you use our YOUTOBIA service online or offline (e.g. ordering online via YOUTOBIA.com, via catalogue or otherwise), we will process transaction-related personal data, such as your first and last name, mailing and shipping address, phone number, email address, credit card or other payment information, and (if you have created a [YOUTOBIA ID]) your date of birth and gender. We will also process information about your purchases with us.

We will use such personal data to process and deliver your order, to provide notification of order status, and to update your profile periodically to ensure that we have the most accurate personal data available. We will also use said personal data to analyze customer behavior and to customize our YOUTOBIA services communication with you, if applicable. In this respect, we may transfer tracking information about your use of our sites to external service providers, which will help us optimize your browsing experience. Optimization services will be performed under a written contract between us and any service provider.

If you opt-in (or upon request), we will send you YOUTOBIA news emails.

You may allow us to share your name, address and ordering activity with carefully selected third parties in whose products we believe you might be interested.

YOUTOBIA Membership

Children can join YOUTOBIA. If the child is under the age of 13, we will, as a general rule, collect personal data relevant to the membership from the parents or legal guardian of the child rather than the child. Where the only personal data needed is the email address of the child (e.g. for participation in a contest), we may collect the email address directly from the child, and provide notification to the parents or legal guardian as required by law.

As a member of YOUTOBIA, the child may receive periodical YOUTOBIA email newsletters, and be able to participate in contests, etc.

When completing a YOUTOBIA membership application, you consent to YOUTOBIA using your child's information for mailings and emails. The data will be used only for YOUTOBIA mailings and will not be sold, rented, or otherwise disclosed to any company outside YOUTOBIA entities except for companies acting as our agents to help us provide services requested by the child.

We will process personal data such as the child's first and last name, mailing address, gender, date of birth, email address and phone number, as relevant.

YOUTOBIA is a subscription based application and service.

If a [YOUTOBIA ID] has not been created previously, we will process personal data such as email address (and a parent or legal guardian email address if the creator is under the age of 13), birthday, country of residence, and gender. We will also require a password and a username to be created.

In order to support billing and customer notification processes, we will process personal data such as your first and last name, mailing address, credit card or other payment information, and email address. We will also process information about your YOUTOBIA purchases.

Cookies

We use cookies on our websites. Cookies are small data files that your browser places on your computer or device. A cookie itself does not contain or collect information. However, when it is read by a server via a web browser it can help a website deliver a more user-friendly service – for example, remembering previous purchases or account details.

We use cookies in order to remember your choices, to give you a better user experience by improving our web sites and for providing content more accurately suited to your needs.

This means we use cookies in order to remember:

Your browser settings, such as the type of browser you use and what plug-ins you have installed. This keeps us from bothering you every time you enter the site in order to make sure that you have the necessary equipment to play a game or download information from our sites. It also allows us to know how many people are using certain types of software, so that we can adjust our site to provide the best browsing experience for every visitor.

Your language and region choice. This means that if you have once chosen English as a language this is the default language that will be using when you revisits us

Your YOUTOBIA ID sign-in state.

Your shopping cart and shopping options.

What products you view and buy in the shop so we can provide you with suggestions

What products and gallery entries you have rated and the rating you have given

The last time we asked you to participate in a survey and whether you answered it so we do not prompt you too often

Your movement on and usage of our sites. We do not collect personal data as part of this. We collect statistical data so we can optimize our site.

Recently used data - to improve performance. In case we store personal data in a cookie, the information will be encrypted and thus safe.

Some cookies last until you close your browser, others are stored for longer. Our maximum cookie age is 400 days – as we want to make sure that you can find your information if you only visit us approximately once a year.

We use third party companies as suppliers for some of our functions. Their use of the data is controlled by our contract with them and they are only allowed to use the data strictly for the purpose we have stated .e.g. the data is not used in connection with data from other companies and we are not tracking user behavior outside our own sites.

Most browsers automatically accept cookies. You can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. Some browsers provide a mode where cookies are always deleted after a visit. This is called InPrivate in Internet Explorer version 8 and newer; Incognito in Google Chrome version 10 and newer; Private Browsing in Firefox version 3.5 and newer; Private Browsing in Safari version 2 and newer and Private Browsing in Opera version 10.5 and newer.

Data security

Access to a number of YOUTOBIA.com services are protected by access restrictions based on the YOUTOBIA ID user name and password. It is important that you always choose a password which is hard to guess for others, and protect your password against disclosure.

All external transmissions of personal data facilitated by us are protected by encryption.

All data storage, at YOUTOBIA operated computer facilities as well as at business partner facilities, will be subject to written contracts.

Generally, processing of personal data will take place in accordance with applicable legislation and best practices concerning data security.

Credit card information is directed to one or more approved and certified service provider(s), and will not be stored by us for longer than it takes to process the data.

Handling of personal data is controlled by documented policies and procedures, including strict physical and logical access control, security back-up, failover, anti-malware protection, monitoring and vulnerability detection mechanisms.

Miscellaneous

The YOUTOBIA may need to change its data processing policy from time to time to keep up with the ways in which we collect, use, transfer, store and/or delete personal data. If policy changes are made, which would materially and adversely affect the privacy of individuals to whom this policy applies, we will endeavor to give notice of such changes to all individuals concerned.

EFFECTIVE DATE: 1th of January 2016