



COMPANYPOLICY

Privacy Policy

Orbit Casino · Atkinson Interactive

We value your privacy and are dedicated to protecting your information and providing you with notice about our information collection and use practices, and how you have a choice to opt-in/out of any marketing or promotional contact from us. By downloading and/or using the Orbit Casino App (the “App”) and/or any Services (together the “Services”), you agree to the following privacy policy.

What information do we collect?

- **Device and app information.** This includes your operating system and version, device model, language, an app-instance identifier Firebase assigns your install, and approximate geographic location derived from your IP address (city/region level, not precise or GPS location). This information is not tied to your name or any other personally identifying detail.
- **Gameplay analytics information.** We use Firebase Analytics, a Google service, to understand how players use the App: which games are opened, when a round is played and how it ends, level and daily-challenge progress, and when a purchase or subscription completes. These events are typed and reviewed — they never include your wallet balance, a wager or payout amount, a purchase price, or any personally identifying information. Firebase Analytics does not collect your device's advertising identifier. See “Firebase Analytics” below for how this data is used and how long it is kept.
- **Advertising information.** The App shows ads through Google AdMob and offers an optional “watch an ad for credits” reward. AdMob may collect ad-related diagnostics (such as whether an ad loaded, was shown, or was clicked), IP-derived approximate location, and — only if you authorize tracking when prompted — your device's advertising identifier, used to personalize the ads you see. See “Advertising (Google AdMob)” and “Your Tracking Choice” below.
- **Communications with us.** If you contact us, we collect the information and content you provide, including your email address or other contact information if you choose to share it. You can contact us anonymously by using an email account that doesn't reveal your identity.
- **Your in-app game data.** Your credit balance, game statistics, level, settings and save data are stored locally on your device only. This data is not transmitted to us or to any server, and we have no access to it — deleting the App deletes it. It is separate from, and never included in, the analytics events described above.

What do we use your information for?

Any of the information we collect from you may be used to:

- Provide, improve, test, and monitor the effectiveness of the App.
- Develop and test new games and features.



- Understand usage trends, such as which games are popular and where players commonly stop playing.
- Show and measure the effectiveness of ads, and let you earn in-app rewards for watching one.
- Announce new features, or other apps published by Winkpass.
- Diagnose and fix technical problems.

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever without your consent, other than the analytics and advertising services described in this policy, or where necessary to deliver the App's own features.

Firestore Analytics

The App uses Firestore Analytics (a Google service) to measure product usage. Firestore assigns your install a pseudonymous app-instance identifier and collects the typed gameplay and purchase events described above, together with standard device, session and approximate-geography information. This is used solely for the analytics purpose — understanding and improving the App — and is not used to personalize ads. Google acts as our service provider for this processing. Firestore Analytics data is retained according to the retention period configured in our Firestore project (Google's Analytics products retain event-level data for up to 14 months by default). To request deletion of analytics data associated with your device, contact us using the details below.

Advertising (Google AdMob)

The App uses Google AdMob to show interstitial and rewarded video ads. AdMob may collect: ads you've viewed and interacted with; device identifiers, including your device's advertising identifier if you have authorized tracking; IP-derived approximate location; and diagnostic/performance data about ad delivery. This information is used by Google and its advertising partners for ad delivery, ad measurement, fraud prevention, and — only where you have authorized tracking — ad personalization. AdMob is the only advertising partner currently integrated in the App.

Your Tracking Choice

On iOS, the App asks for your permission before any tracking occurs, using Apple's App Tracking Transparency framework. This request appears the first time you reach an actual advertising moment in the App — never at launch. If you decline or have not yet been asked, the App still shows non-personalized ads and every game, reward and purchase continues to work exactly the same. You can review or change your choice at any time in your device's Settings app under Privacy & Security -> Tracking.

How do we protect your information?

We implement a variety of security measures to maintain the safety of your information. Your gameplay data (credit balance, statistics, level and settings) is stored locally on your device and is never transmitted to us. Any information that does leave your device — the analytics and advertising data described above —



is transmitted using industry-standard encryption (TLS/SSL). Although we strive to use commercially acceptable means of protecting this data, no method of transmission over the internet or method of electronic storage is 100% secure, and we cannot guarantee its absolute security.

Do we disclose any information to outside parties?

Disclosure of Personal Information. Winkpass may disclose information if required to do so by law or in the good-faith belief that such action is necessary to prevent injury or property damage.

Information Sharing and Third-Party Service Partners. Winkpass does not rent, sell, or share your information with other people or non-affiliated companies without your consent, other than as set out in this Privacy Policy: the App integrates Google Firebase Analytics and Google AdMob, described above, who process information as our service providers or, for AdMob's advertising measurement and personalization uses, as independent controllers under their own privacy policies. If Winkpass becomes involved in a merger, acquisition, or sale of some or all of its assets, we will ensure the confidentiality of any personal information involved and provide reasonable notice before it becomes subject to a different privacy policy.

Link to privacy policy of third-party service providers used by the App:

- [Google Firebase / Google Analytics](#)
- [Google AdMob](#)

Third-party links. Occasionally, at our discretion, we may include or offer links to other apps or services, including our own other apps. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites, though we welcome any feedback about them.

California Online Privacy Protection Act Compliance

Because we value your privacy we have taken the necessary precautions to be in compliance with the California Online Privacy Protection Act. We do not distribute your personal information to outside parties without your consent, except as described in this Privacy Policy. California residents may also have rights under the California Consumer Privacy Act (CCPA); to exercise them, contact us using the details below.

Children's Online Privacy Protection Act Compliance

We are in compliance with the requirements of COPPA (Children's Online Privacy Protection Act) — we do not knowingly collect any information from anyone under 13 years of age. The App, its products and services are directed to people who are at least 13 years old or older, and simulated-gambling content means the App is rated for a mature audience on the App Store.

Online Privacy Policy Only

This online privacy policy applies only to information collected through the App and not to information collected offline.



Legal basis for processing (for EEA users)

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. This means we collect and use your information only where:

- We need it to provide you the Services, including to operate the Services and protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose, such as authorizing tracking for ad personalization; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use, though in some cases this may mean no longer using the Services.

Your Consent

By using the App, you consent to this privacy policy.

Changes to our Privacy Policy

If we decide to change our privacy policy, we will post those changes on this page, and/or update the modification date below.

Contacting Us

If there are any questions regarding this privacy policy, or if you wish to have your data permanently deleted, you may contact us using the feedback link from the App under Settings, or by emailing our data protection officer at: privacy@winkpass.com.

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