

## **Agents of Discovery Inc. Mobile App Privacy Policy**

Effective Date: December 18, 2023

### **1. INTRODUCTION**

Welcome to the Agents of Discovery Inc. Mobile App Privacy Policy. This platform allows partners to create, manage, and publish location-based games (called "**Missions**") in locations such as: schools or higher education (called "**Formal Education**"); parks, nature centres, and similar locations (called "**Informal Education**"); and retail outlets, business organisations, and other similar locations (called "**For-profit and Nonprofit entities**"). These definitions will hereinafter be referred to as "Partners".

Partners use our content creation tool (called the "**Mission Maker**") to publish to the Agents of Discovery Inc. mobile application (called the "**Mobile App**") – these are collectively referred to as the "**Platform**". Together, we are encouraging people of all ages across the globe to get active and engaged while discovering the world around them. We thank you for joining the Move to Play & Learn movement.

Agents of Discovery Inc. is committed to protecting user privacy, as well as providing a safe and fun learning platform. This Privacy Policy explains what type of information is collected from users of the Mobile App, and what the information is used for.

### **2. COMPANY BACKGROUND**

The Mobile App is owned and operated by Agents of Discovery Inc., a corporation registered under the laws of the Province of Alberta, Canada. Contact details of Agents of Discovery Inc. are provided in Section 14 of this Privacy Policy.

### **3. GENERAL USAGE AND GUEST USERS**

Users can play the Mobile App as a guest by selecting the "Missions" button immediately upon landing on the main screen. This approach does not require users to log in. No personal information is collected by Agents of Discovery Inc. from guest users. Device information or identifiers are collected and used by third parties solely for the purposes of collecting and providing diagnostic information to Agents of Discovery Inc., as well as providing services to the user.

The Mobile App invites players to embark on Missions, which are remote or location-based games found at participating locations. Missions may require players to explore the participating location to unlock gamified content ("**Challenges**") through scanning Quick Response ("**QR**") Codes, scanning Image Recognition ("**IR**") images, or using their device's Global Positioning System ("**GPS**") coordinates.

The Mobile App asks permission before accessing a user's GPS location data, microphone, camera, internal/external storage, step counter, and/or other device sensors to support gameplay. However, a guest user's data is only stored internally on the guest user's device and never collected by Agents of Discovery Inc. (There may be exceptions; one example being third-party diagnostic device information and services, and anonymous aggregate usage data – see Section 8 and Section 7.4).

#### **4. REGISTERED APP ACCOUNTS**

With parental/legal guardian permission, Children may sign up with a registered app account in the game. A "Child" or "Children" refers to a person or person(s) who are (a) under 13 years old (for residents outside of the European Economic Area (EEA)); (b) under 16 years old or such age needed to consent to the processing of personal data in their country of residence (for residents of the EEA). This allows users to save their Mission progress in the Platform. Personal information is collected from registered app accounts – see a full list of what information is collected in Section 6 below. In the registered app account creation process, the Mobile App asks for a username, password, and email address (for activation purposes) to create the registered account.

Children are required to submit their parent/legal guardian's email in place of their own to ask permission to create a registered app account. The password, username, and email address are solely requested to obtain parental/legal guardian consent for the creation of the registered app account. If the parent/legal guardian does not respond to a request to obtain consent within 30 days, the account will be deleted.

Agents of Discovery Inc. sends an account activation email to the email address provided for the parent/legal guardian. This email outlines what information Agents of Discovery Inc. collects, what the information is used for, and how to access the Privacy Policy. In addition, the email shows how to revoke consent relating to the collection of a user's data in their registered app account, thereby advising parents/legal guardians of their right to view any personal information about their Child which is collected through use of the Platform.

If desired, parents/legal guardians can request modifications or deletion of said personal information by emailing [legal@agentsofdiscovery.com](mailto:legal@agentsofdiscovery.com). Parents/legal guardians may also request that no personal information be collected from their Child through use of the Platform by emailing [legal@agentsofdiscovery.com](mailto:legal@agentsofdiscovery.com).

## **5. TEACHER CONSENT**

For use of the Platform in classroom activities, a teacher may provide consent to the creation of a registered app account on behalf of the parent/legal guardian.

Nevertheless, the teacher may elect to obtain parent/legal guardian consent either through having the student provide their parent/legal guardian's email address when creating a registered app account, or by having the parent/legal guardian sign a permission slip.

Alternatively, teachers may have their students play the Platform as guest users, in which case no personal information is collected through use of the Platform.

## **6. WHAT INFORMATION IS COLLECTED BY THE PLATFORM**

### **6.1. INFORMATION COLLECTED FROM REGISTERED ACCOUNTS**

Agents of Discovery Inc. collects the following information from registered app accounts:

- Login credentials (username and password)
- Email address
- Birth year, grade level and gender (at the option of the player)
- Missions downloaded
- Mission progress and performance (e.g. Challenges Found/Completed, Times Visited, or USBees earned)
- Estimated miles/kilometres travelled and time spent playing each Mission
- Location data
- Preferred language
- Device information and identifiers collected through third parties, for the sole purpose of collecting diagnostic data and providing services related to the Platform
- Player response data (images or text collected in response to questions from Image Player Response or Text Player Response Challenge types)

Agents of Discovery Inc. does not sell any personal information to third parties. Certain Partners are able to access player performance information from registered app accounts to assess the effectiveness of their Mission(s). See Section 7 to learn more about why information is collected.

## **6.2. REQUESTED DEVICE PERMISSIONS**

Agents of Discovery Inc. may access the following device permissions:

- Camera, for the purpose of playing Challenges in a Mission.
- Location/Location Services, for the purpose of playing GPS-based Missions and providing analytic data related to estimated distances travelled by the player.
- Microphone, for the purpose of playing Challenges in a Mission. No microphone data is ever collected or stored.
- Internal/External Storage, for the purpose of storing app, player, and Mission data.
- Step Counter, for the purpose of collecting and improving analytic data related to estimated distances travelled by the player.

## **7. WHY THE INFORMATION IS COLLECTED**

### **7.1. GENERAL**

Agents of Discovery Inc. collects personal information to support gameplay, gauge effectiveness and reach of the Platform, and can permit educators to monitor and evaluate their learners' performance using the Platform. Agents of Discovery Inc. does not share or sell personal information for commercial purposes. Agents of Discovery Inc. may in rare circumstances use your email address to contact you (such as if you are a winner in an Explorer Campaign).

### **7.2. INFORMATION COLLECTED TO SECURE PARENTAL/LEGAL GUARDIAN CONSENT**

Agents of Discovery Inc. collects the username, password, and email address of a parent/legal guardian to facilitate the creation of a registered app account. For more information about why this information is collected, see Section 4 (above).

### **7.3. INFORMATION COLLECTED TO SUPPORT PLATFORM USE**

Agents of Discovery Inc. collects a username, password, and email address from a registered app account to allow the player to sign in to any device to use the Platform and save their progress. Agents of Discovery Inc. collects information to support user experience and provide feedback to Partners regarding a Mission's effectiveness.

This information includes, at the option of the player with a registered app account (or the parent/legal guardian): Grade level, birth year, and gender. During gameplay, Agents of Discovery Inc. also collects Missions downloaded, Mission progress, Mission performance, player responses (in the form of text or images captured with their device), estimated distance travelled, estimated time spent playing, and USBees earned by solving Challenges.

Agents of Discovery Inc. collects username, password, and a parent/legal guardian email address for administrative purposes, which includes prevention of duplicate accounts, password reset requests, account activation, and requests to view, modify, or delete personal information (upon request to [legal@agentsofdiscovery.com](mailto:legal@agentsofdiscovery.com)).

### **7.4. INFORMATION COLLECTED TO GAUGE MISSION EFFECTIVENESS**

Agents of Discovery Inc. de-identifies the information described in Section 6.1. to share aggregate user statistics with Partners who wish to gauge the effectiveness and reach of their Missions. Usernames associated with registered accounts may be made visible to our Partners upon request for the purpose of Mission-specific analysis and engagement improvement.

### **7.5. INFORMATION COLLECTED FOR CLASSROOM USE**

Educators may use the Platform as part of classroom activities. At the teacher's discretion, Agents of Discovery Inc. may share personal information of students with the Partners for educational purposes.

This information includes: username, parent/legal guardian email address, age, Grade level, gender, Missions downloaded, Mission progress, Mission performance, USBees earned, player responses (in the form of text or images captured with their device), estimated distance travelled playing Missions, and estimated time spent playing Missions.

This allows educators and teachers to monitor and evaluate performance of students playing the Platform. Upon request, this information may be shared with the parent/legal guardian of the student or with a teacher, school, or school district, as provided for by law. Agents of Discovery Inc. does not use any personal information collected from students for any purposes other than education.

## 8. THIRD PARTIES

The following third parties may collect data during your use of the app for the purpose of providing services and collecting diagnostic information on behalf of Agents of Discovery Inc.:

- Unity (game engine) – see Privacy Policy here: <https://unity3d.com/legal/privacy-policy>
- Google Firebase Cloud Messaging (i.e. push notifications)
  - Collects Instance IDs to determine which devices to send a message to.
- Microsoft Visual Studio App Center (does not collect personally identifiable information)
- Apple App Analytics
- Google Play Statistics

Agents of Discovery Inc. may update this list of Third Parties in future Privacy Policy updates, and reserves the right to change this list at any time.

## 9. DATA RETENTION & DELETION

We will keep your personal information only as long as is reasonably necessary for the purposes described in this Privacy Policy, or for a longer period as may be required by applicable laws.

When you delete your registered app account your personal information is not deleted automatically. We will initiate the manual deletion process of your personal information after you have deleted your registered app account.

You can also request that we suspend or delete your personal information by writing to us at [legal@agentsofdiscovery.com](mailto:legal@agentsofdiscovery.com).

## 10. DATA TRANSFERS

You shall acknowledge that your personal information may be stored and processed in any country where we have facilities or in which we engage third-party service providers. By using the Mobile App you understand that your personal information will be transferred to countries outside of your country of residence.

These countries may have different data protection rules as opposed to the rules applicable in your country of residence. We will take measures to ensure that your personal information is treated as securely as it is with us.

## **11. SECURITY MEASURES**

We employ appropriate technical and organisational measures to ensure the security of your personal information when it is collected, processed, transmitted or stored. For example, your personal information is encrypted during transmission and at rest. However, you should be aware that despite all measures we take to maintain the safety and security of your personal information, no transmission over the Internet can ever be guaranteed to be 100% secure. Therefore, we cannot fully guarantee the security of any personal information that you transfer over the Internet to us.

It is your sole responsibility to keep your username and password confidential. We shall not be responsible or liable for your loss of your username and/or password. If you believe your username/password has been compromised you must contact us without undue delay.

## **12. CHANGES**

Please note that Agents of Discovery Inc. may update or change the Privacy Policy from time to time. We may do this in response to the legal and/or business environment or other reasons. In the event of a change, we will inform you of such a change by displaying a notice of changes upon your access to the Mobile App. The notice will refer you to the most current version of the Privacy Policy, and you will be required to consent to such changes in order to continue playing the Mobile App. You can also request the most current version of the Privacy Policy at any time by emailing [legal@agentsofdiscovery.com](mailto:legal@agentsofdiscovery.com).

Furthermore, any new features that change or enhance the Mission Maker and/or Mobile App, including the release of new tools and resources, will be subject to the most current version of the Privacy Policy.

## **13. SUBMISSION TO JURISDICTION**

This Agreement will be governed by and construed in accordance with the laws of the Province of Alberta and applicable laws of Canada without reference to conflict of laws rules which might refer any matter to the laws of another jurisdiction. Each of the parties irrevocably submits to the non-exclusive jurisdiction of the courts of the Province of Alberta.

#### **14. QUESTIONS? CONCERNS? REQUESTS?**

For questions, concerns, or requests (including requests to view your or your Child's personal information collected by the Platform, and requesting modification or deletion of personal information) under this Privacy Policy, please contact us through the following means:

Email: [legal@agentsofdiscovery.com](mailto:legal@agentsofdiscovery.com)

Address: 201-2040 Springfield Road, Kelowna, BC, Canada, V1Y 9N7

Phone: 1-855-564-7328