

PRIVACY POLICY

Last Updated: 10th May, 2026

1. Introduction

Normal Turtle Pty Ltd ("we," "us," or "our") operates the Super Scratch Party mobile application ("App"). This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our App.

We are committed to protecting your personal information and your right to privacy in accordance with applicable data protection laws, including:

- The Australian Privacy Principles,
- The General Data Protection Regulation (GDPR),
- United States federal and state privacy laws, including the California Online Privacy Protection Act (CalOPPA) and the California Consumer Privacy Act (CCPA) as amended by the CPRA,
- Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and provincial privacy laws,
- New Zealand Privacy Act 2020,
- The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- The Ley Federal de Protección de Datos Personales en Posesión de los Particulares (LFPDPPP) of Mexico,
- Data protection laws applicable in Peru, Argentina, Colombia, and Bolivia.

2. Information We Collect

2.1 Information You Provide

- **Date of Birth & Region:** This processing is necessary for compliance with our Legal Obligation to restrict access to our services based on age.
 - **For Apple Users (all available regions, including UK):** We utilize the Apple Declared Age Range API globally to verify your age category. We receive a verified age-range signal from your Apple account; we do not collect or store your specific date of birth."
 - **For Android Users in Utah and Louisiana:** We utilize the Google Play Age Signals API to receive a verified age-category signal from your Google account to satisfy regional regulatory requirements.
 - **For All Other Android Users:** Your date of birth and region are collected and processed locally on your device for age verification purposes only. This information is not transmitted to or stored on our servers.
- **Username and Display Name Information:** We collect the name you enter to play the game. It is optional if you want to enter your full and real name. We need this information so other players can identify you in the game. This information is provided by you directly through user input and is stored temporarily in our Firebase Firestore database. This processing is based on your consent and the Contractual Necessity of providing the core multiplayer game service.
- **User-Generated Content:** When you create custom quests, we collect and store the content you create, including text and game-related information. This content is used for gameplay purposes, feature development, and content moderation. All user-generated content is stored temporarily in our Firebase Firestore database. This processing is based on your consent and the contractual necessity of providing the custom quests feature.
- **In-App Purchase Information:** All in-app purchases are processed by Apple (StoreKit) or Google (Google Play Billing Library). We do not collect, process, or store any sensitive payment information. From Apple and Google, we receive limited transaction data including basic purchase records (such as product identifiers, purchase dates, and transaction status), purchase receipts, and anonymised identifiers that enable purchase restoration. We use this information solely to verify and activate your purchases, enable purchase restoration when needed, and maintain records as required by law. For information about the actual payment processing and transaction records, please refer to Apple's or Google's respective privacy policies. This processing is based on the contractual necessity to fulfil the transaction.
- **Email address:** We will only collect your email address information if you submit a support request submission form at our Contact Us page on our website (<https://normalturtle.com/contact>). This processing is based on your consent when you contact us and our legitimate interests to provide customer support.

2.2 Automatically Collected Information

- **Device Information:** We generate and store a unique device identifier (UUID) on your device to assign a persistent local player identity. This identifier is stored in your device preferences and is not shared with external parties. This processing is based on the contractual necessity of providing a functional service, and our Legitimate Interests for maintaining game functionality and progress
- **Technical Data:** Our service automatically collects certain technical information necessary for operation, including your IP address (required for Firebase functionality), screen size and resolution (used for UI scaling), and error and crash reports for service improvement. This processing is based on the contractual necessity of providing a safe and stable service, and our Legitimate Interests for maintaining security, service stability and troubleshooting.
- **Usage Data:** We collect information about how you interact with our App, including your game progress, statistics, and feature usage patterns. This information helps us understand how users engage with our App and allows us to improve the user experience. This processing is based on the contractual necessity of providing a balanced and functional game experience, and our legitimate interests for service stability, fraud detection, and fundamental product improvement.
- **Age-range Data:** For all Apple users and Android users in supported jurisdictions (Utah and Louisiana), we automatically receive verified age-range tokens or signals from Apple or Google to verify eligibility for our services.

3. How We Use Your Information

3.1 Core Functionality

- **Game Session Management:** We use your information to manage active game sessions, maintain leaderboard functionality, and deliver custom quests to you and other players. This processing is based on the contractual necessity of provide our core services, including active game sessions, leaderboards, and quest delivery.
- **Transaction Processing:** Your purchase information is used to facilitate in-app transactions, verify payments, and enable the restoration of purchases when necessary. This processing is based on the contractual necessity to facilitate transactions, verify payments and enable purchase restoration.

- **User Content Management:** We process user-generated content to store and serve custom quests, perform content moderation, and develop new features based on user engagement patterns. This processing is based on the contractual necessity to store and serve custom quests.

3.2 Service Improvement

- **Analytics and Performance:** This processing is necessary under our legitimate interests to analyse usage patterns, track errors, and monitor app stability to improve our services. This analysis helps us identify and resolve technical issues and enhance app performance.
- **User Experience Enhancement:** We use collected data to optimise our interface, analyse feature usage, and improve overall app performance. This processing helps us provide a better gaming experience for all users.
- **Customer support:** In the event you submit a support request form on our Contact Us page located on our website (<https://normalturtle.com/contact>), we may use your email address solely to provide customer support to you.

4. Data Retention and Deletion

4.1 Retention Periods

- **Temporary Data:** We maintain certain data for a 24-hour period, including usernames, display names, game session data, custom quest content, and game points and statistics. This temporary retention period helps maintain game functionality while protecting user privacy.
- **Extended Retention:** We retain certain information for longer periods where necessary. Purchase records are maintained as required by applicable laws and regulations. Analytics data is retained for the duration of our service to support ongoing improvements. Error logs are kept for debugging purposes to ensure service stability. In the event you submit a support request form on our Contact Us page located on our website (<https://normalturtle.com/contact>), your email address will only be kept as long as is required to resolve your customer support request.

4.2 Data Deletion

- **Automatic Deletion:** Our system automatically deletes session data 24 hours after your game session ends. Custom quests are removed 24 hours after creation, and temporary cache data is cleared when you close the App. This automatic deletion helps protect your privacy and maintain data minimisation.
- **User-Initiated Deletion:** You may request deletion of your data by contacting us via email. Our team processes these requests manually and will provide confirmation once the deletion is complete. Please note that certain information may be retained if required by law or for legitimate business purposes.

5. Information Sharing and Disclosure

5.1 Third-Party Service Providers

- **Firebase Services:** We use Firebase Core and Firestore for cloud hosting and data storage. These services process your username, game statistics, user-generated content, and IP address on global servers located in the United States and European Union.
- Firebase Analytics processes usage patterns and interaction data to help us improve the App. This data is processed on servers in the United States and Europe.
- Firebase Crashlytics monitors app stability by processing error reports and usage context data on global servers. This helps us identify and resolve technical issues promptly.
- **Payment Processing:** For Apple users, we utilise Apple StoreKit to process in-app purchases.
- For Android users, the Google Play Billing Library processes similar purchase-related data on global servers.
- We utilise Apple (all available regions, including UK) and Google (in specific regions like Utah and Louisiana) as service providers for age verification. These platforms process account-level data to provide the App with an age-appropriate signal.

5.2 Online Tracking Disclosure (CalOPPA):

Please note that our service providers, specifically those providing analytics services, may collect personally identifiable information about an individual consumer's online activities over time and across different websites or online services when a consumer uses our App.

5.3 Data Transfer Safeguards

Our service providers (Firebase, Apple, and Google) may process and store data (outlined in section 5.1) in various locations according to their respective privacy policies and data handling practices.

Information processed in foreign jurisdictions, such as the United States, may be subject to access requests from governments, courts, or law enforcement agencies in those jurisdictions.

For users in specific regions, we provide the following information:

- For Australian Users: By continuing to use the App, you acknowledge and expressly consent to the disclosure of your personal information (including Username, User-Generated Content, Age Verification Signals and App Usage Data) to overseas recipients (Google, Apple) in the United States and the European Union. We will not be accountable under section 16C of the Privacy Act 1988 for any act or practice of the overseas recipient that breaches the APPs.
- For Canadian Users: Personal information transferred to the United States or other foreign jurisdictions will be subject to the laws of those jurisdictions and may be disclosed to or accessed by the courts, law enforcement, and national security authorities of those jurisdictions.
- For New Zealand Users: By continuing to use the App, you acknowledge and expressly consent to the disclosure of your personal information (including Username, User-Generated Content, Age Verification Signals and App Usage Data) to overseas recipients (Google, Apple) in the United States and the European Union. You acknowledge that these overseas recipients may not be required to protect the information in a way that, overall, provides comparable safeguards to those in the New Zealand Privacy Act 2020.

- (d) For United States Users: By using the App, you acknowledge that in certain jurisdictions (such as Utah and Louisiana), we utilize platform-level verification tools provided by Google and Apple to confirm your age category. Personal information, including Age Verification Signals, is processed by these providers on servers that may be located outside of your home state.
- (e) For Users in Latin America (Mexico, Peru, Argentina, Colombia, Bolivia): We rely on your consent for the transfer of your personal information to our service providers located in the United States and other countries. These transfers are necessary for the provision of the App's services as described in this policy.
- (f) For UK and GDPR Users: When transferring data outside of the European Economic Area, we rely on legally approved mechanisms to ensure adequate protection, primarily Standard Contractual Clauses (SCCs) and the UK International Data Transfer Addendum, as implemented in our Data Processing Agreement with Google (Firebase) and the terms of service with Apple. This includes the transfer of Age Verification Signals to Apple's global servers.

6. Data Security

We take reasonable measures to protect your information and rely on established service providers (Firebase, Apple, and Google) who maintain industry-standard security practices. For detailed information about security measures, please refer to our service providers' respective security policies.

7. Changes to This Privacy Policy

We will notify you of any material changes to this Privacy Policy through the App. Your continued use of the App after such notification constitutes acceptance of these changes.

8. Contact Us

For privacy-related questions, concerns, or requests:

Email: support@normalturtle.com

9. Your Privacy Rights

We respect your right to control your personal information. Depending on your jurisdiction, you may have the following rights, which you can exercise by contacting us at support@normalturtle.com:

- (a) For Users in the United States (California and other states), you have the right to:
 - Know: Request to know the categories and specific pieces of personal information we have collected about you.
 - Delete: Request the deletion of your personal information.
 - Correct: Request the correction of inaccurate personal information.
 - Opt-Out of Sale/Sharing: We do not sell your personal information. You have the right to opt-out of the "sharing" of your personal information for cross-context behavioural advertising.
 - Non-Discrimination: You have the right not to be discriminated against for exercising your privacy rights.
- (b) For Users in Canada:
 - You have the right to access your personal information held by us and to request that any inaccurate information be corrected. You may also withdraw your consent to our collection, use, or disclosure of your personal information at any time, subject to legal or contractual restrictions.
- (c) For Users in Mexico, Peru, Argentina, Colombia, and Bolivia (ARCO Rights), you have the right to:
 - Access: Access the personal information we hold about you.
 - Rectify: Correct your personal information if it is inaccurate or incomplete.
 - Cancel: Request the deletion of your personal information.
 - Oppose: Object to the processing of your personal information for specific purposes.
- (d) For Users in the European Union, Australia, New Zealand and the United Kingdom, you can exercise the following rights by contacting us directly at support@normalturtle.com:
 - The right to confirm whether we are processing your personal data and to receive a copy of that data.
 - The right to request the correction of inaccurate or incomplete personal data.
 - The right to request the deletion of your personal data.
 - The right to request that we limit the way we use your personal data.
 - The right to object to our processing of your personal data based on legitimate interests.

10. California "Do Not Track" Disclosure (CalOPPA)

We are committed to providing you with meaningful choices regarding the data collected on our App. However, there is no industry-standard technology or universally agreed-upon definition for how mobile applications should respond to "Do Not Track" signals. Therefore, we do not currently respond to DNT signals sent from mobile devices.

For information about how our third-party provider, Google (which includes Firebase), collects and processes data, and to learn about your choices regarding this collection, please refer to their respective Privacy Policies.

11. California Shine the Light Law

We do not disclose, sell, or share personal information to third parties for their direct marketing purposes.

12. Children's Privacy

Our App is restricted to users who are not minors and is not directed to children under 13. We do not knowingly collect personal information from children under 13 years of age or under 16 years of age in California without parental consent. To prevent the collection of personal information from children, we employ the Apple Declared Age Range API (for all iOS users, including the UK) and the Google Play Age Signals API (in supported regions) to identify and restrict access for users under the required age. If we learn that we have collected the personal information of a child without the required consent, we will take reasonable steps to delete the information promptly.

13. Data Protection Officer / Privacy Contact

To ensure accountability, we have designated a contact person responsible for overseeing our compliance with this Privacy Policy and applicable data protection laws. For any questions or to exercise your rights, please contact our Privacy team at support@normalturtle.com.