

SimWin Sports Inc.

Privacy Policy

Last Revised on December 6, 2021

This Privacy Policy for SimWin Sports Inc. and its affiliates (collectively, “**Company**”, “**we**”, “**us**” “**our**”) describes how we collect, use and disclose information about (i) users of the Company’s website (<https://simwinsports.io>), together with any content, tools, features and functionality offered on or through our website and (ii) any individuals who apply for jobs with the Company, including those who apply via the website (collectively, our “**Platform**”) or otherwise submit information through the Platform. For the purposes of this Privacy Policy, “**you**” and “**your**” means you as the user of the Platform.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY USING, ACCESSING, OR DOWNLOADING THE PLATFORM, YOU AGREE TO THE USE OF YOUR INFORMATION IT DESCRIBES AND TO THE OTHER TERMS OF THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, PLEASE DO NOT ACCESS AND USE THE PLATFORM.

#### 1. UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date at the top of this Privacy Policy. If we make changes that are material, we will use reasonable efforts to attempt to provide notice to you and, where required by applicable law or otherwise in our discretion, we will obtain your consent. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on the Platform, or by other means, consistent with applicable law. However, it is your sole responsibility to review the Privacy Policy from time to time to view any such changes. The updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the updated Privacy Policy. IF YOU DO NOT AGREE TO ANY UPDATES TO THIS PRIVACY POLICY PLEASE DO NOT ACCESS OR CONTINUE TO USE THE PLATFORM.

#### 2. COMPANY’S COLLECTION AND USE OF INFORMATION

When we provide you with the Platform, we may ask you to or you may provide us with certain details or information about you as follows:

- The following basic contact details: name, email and phone number. We collect basic contact details to communicate with you.
- The following account information: username and password. We collect account information to maintain and secure your account with us. If you choose to use the Platform and register an account, you are responsible for keeping your account credentials safe. We highly recommend that you do not share your username, password, or other access details with anyone else. If you believe your account has been compromised, please contact us immediately.

- The following social media account information: age group and information about pages you like or accounts you follow. We also collect social media login information in order to facilitate login to our Platform and to better tailor the Platform to you.
- The following job applicant details: name, email, phone number, information included in your resume, CV or other content you provide, details of your qualifications, skills, experience education history and employment history, interview feedback, information we gather conducting reference checks, and work authorization status. We collect job applicant details in the context of your application for employment.
- The following performance metrics: marketing channel traffic and purchaser demographics. We collect performance metrics in order to create aggregated, anonymized reports.
- The following information you choose to provide us through the Platform: information about your interests, date of birth and identifiers for interoperability. We collect information about your interests in order to better tailor the Platform to you, date of birth to verify you are old enough to use the Platform and interoperability information to connect you with third party accounts.
- Any other information you choose to include in communications with us, for example, when contacting us through the Platform.

Some features of the Platform may require you to enter certain information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features.

We also automatically collect certain information about your interaction with the Platform (“**Usage Data**”). To do this, we may use cookies, web beacons/clear gifs, other geolocation tracking technologies (“**Tracking Technologies**”). Usage Data may include:

- Unique device identifier
- Device type, such as your phone, computer, or tablet
- IP address
- Browser type
- Usage Data, such as date and time stamps, such as the date and time you first accessed the Platform
- Operating system
- Log data
- Approximate location, including latitude and longitude
- Time zone
- Other information regarding your interaction with the Platform, such as clickstream data, ad impressions, primary market transactions and interactions with secondary marketplaces, collectibles and collections

We use the information we collect automatically to improve the functionality of the Platform, to improve the security of your account, to monitor and manage your usage of the Platform, to tailor

features and content to you, to run analytics and better understand user interaction with the Platform.

In addition to the foregoing, we may use all of the above information to comply with any applicable legal obligations, to enforce any applicable terms of service, and to protect or defend the Platform, our rights, the rights of our users, or others.

### 3. HOW THE COMPANY SHARES YOUR INFORMATION

In certain circumstances, the Company may share your information with third parties. Such circumstances may include:

- With vendors or other service providers, such as:
  - Payment processors
  - Cloud storage providers
  - Email marketing services vendors
  - Security vendors
  - Human resources service providers, including for processing job applications and conducting background checks
- With our affiliates or otherwise within our corporate group;
- With our platform partners to facilitate interoperability and the provision of the Platform to you and for you to make payments;
- With third parties for marketing purposes;
- To comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries;
- In connection with an asset sale, merger, bankruptcy, or other business transaction;
- To enforce any applicable Terms of Service;
- To ensure the safety and security of the Company and/or its users;
- When you request us to share certain information with third parties, such as through your use of social media widgets or login integrations; and
- With professional advisors, such as auditors, law firms, or accounting firms

You acknowledge that such sharing of information may occur in all of the aforementioned circumstances and is permitted by and subject to this Privacy Policy.

### 4. COOKIES AND OTHER TRACKING TECHNOLOGIES

#### **Do Not Track Signals**

Your browser settings may also allow you to transmit a “**Do Not Track**” signal when you visit various websites. Like many websites, our website is not designed to respond to “**Do Not Track**” signals received from browsers. To learn more about “**Do Not Track**” signals, you can visit <http://www.allaboutdnt.com/>.

#### **Cookies and Other Tracking Technologies**

You may control the way in which your devices permit the use of Tracking Technologies. If you so choose, you may block or delete our cookies from your browser; however, blocking or deleting cookies may cause some of the Platform, including any portal features and general functionality, to work incorrectly.

Most browsers accept cookies automatically. However, you may be able to configure your browser settings to use the Platform without some cookie functionality. You can delete cookies manually or set your browser to automatically delete cookies on a pre-determined schedule.

To opt out of tracking by Google Analytics, click [here](#).

If you have questions regarding the specific information about you that we process or retain, as well as your choices regarding our collection and use practices, please contact us using the information listed below.

## 5. USER GENERATED CONTENT

Certain features of the Platform may allow you to upload content (e.g., usernames, first name, last name, a profile picture or biography) directly to the Platform (“**User-Generated Content**” or “**UGC**”). We or others may store, display, reproduce, publish, or otherwise use UGC, and may or may not attribute it to you. Others may also have access to UGC and may have the ability to share it with third parties. If you choose to submit UGC to any public area of the Platform, your UGC will be considered “public” and will be accessible by anyone, including the Company.

Please note that we do not control who will have access to the information that you choose to make available to others, and cannot ensure that parties who have access to such information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the features permitting creation of UGC or what others do with information you share with them. We are not responsible for the accuracy, use or misuse of any such UGC that you disclose or receive from third parties.

## 6. SOCIAL FEATURES

Certain features of the Platform permit you to initiate interactions between the Platform and third-party services or platforms, such as social networks (“**Social Features**”). Social Features include features that allow you to click and access the Company’s pages on certain third-party platforms, such as Facebook, Twitter, and Discord and from there to “like” or “share” our content on those platforms. Use of Social Features may entail a third party’s collection and/or use of your data. If you use Social Features or similar third-party services, information you post or otherwise make accessible may be publicly displayed by the third-party service you are using. Both the Company and the third party may have access to information about you and your use of both the Platform and the third-party service. For more information on third-party websites and platforms, see [Section 7](#).

## 7. THIRD PARTY WEBSITES AND LINKS

Our Platform may contain links to other online platforms operated by third parties. We do not control such other online platforms and are not responsible for their content, their privacy policies,

or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Facebook, Twitter, or Discord) may also be viewable by other users of the Platform and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators except as disclosed on the Platform. We expressly disclaim any and all liability for the actions of third parties, including but without limitation to actions relating to the use and/or disclosure of personal information by third parties. Any information submitted by you directly to these third parties is subject to that third party’s privacy policy.

## 8. CHILDREN’S PRIVACY

Children under the age of 13 are not permitted to use the Platform, and we do not seek or knowingly collect any personal information about children under 13 years of age. If we become aware that we have unknowingly collected information about a child under 13 years of age, we will make commercially reasonable efforts to delete such information from our database.

If you are the parent or guardian of a child under 13 years of age who has provided us with their personal information, you may contact us using the below information to request that it be deleted.

## 9. DATA SECURITY

Please note that any information you send to us electronically, while using the Platform or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable, and we cannot guarantee “perfect security.” Any information you send us through any means is transmitted at your own risk.

## 10. CALIFORNIA USERS

This section applies only to California residents. For purposes of this Section 10, “personal information” has the meaning given in the California Consumer Privacy Act (“CCPA”) but does not include information exempted from the scope of the CCPA.

In the past 12 months, we have collected the categories of information we set out in Section 2 above. We do not sell personal information to third parties and have not done so in the past 12 months. The below table explains our current practices, and our practices for the past 12 months, related to the categories of personal information we collect about you, the purposes for collecting personal information and whether we disclose your personal information, and if so, to whom.

Categories of Personal Information We May Collect	Categories of Sources	Examples of Uses	Categories of Third Parties With Which We May Share That Information
<b>Identifiers</b>	You, if you choose to provide to us.	Providing the Services, including registration and	Affiliates. Service providers.

<p>such as name, billing and shipping addresses, email address, billing information, username, any provided phone numbers, such as home, mobile or fax, online screen name, security questions and password.</p>	<p>Your use of our services/automatically collected from you. Affiliates. Third parties (such as service providers and other users who, for example, may refer you to use the Services). Consumer data resellers. Events, such as conferences. Public records databases.</p>	<p>customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance. Editorial uses.</p>	<p>Other individuals or companies at your request. Third parties, such as third-party advertisers, and advertising and list brokering networks and analytics providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>
<p><b>Commercial information</b></p> <p>such as records of your purchases and transaction data.</p>	<p>You, if you choose to provide to us. Your use of our services/automatically collected from you. Affiliates. Third parties (such as service providers). Third Parties (such as Data Brokers).</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance. Editorial uses.</p>	<p>Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as third-party advertisers and advertising and list brokering networks and analytics providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>
<p><b>Financial data</b></p> <p>such as credit or debit card number, verification number, and expiration date, to process payments and information about your transactions and purchases with us.</p>	<p>You, if you choose to provide to us. Third parties (such as service providers and third parties confirming payments made on your behalf). Affiliates.</p>	<p>Providing the Services. Facilitating payment. Fixing and improving the Services. Analyzing use of the Service. Security, fraud and legal compliance.</p>	<p>Affiliates. Service providers. Other individuals or companies at your request. Third parties relating to legal requests, if required by law. Third parties for sales or transfers of our business or assets.</p>
<p><b>Protected Classifications</b></p> <p>such as race, gender, sexual orientation, gender identity, marital status, religious affiliation, military or veteran status,</p>	<p>You, if you choose to provide to us. Third parties (such as Data Brokers).</p>	<p>Providing the Services. Fixing and improving the Services. Analyzing use of the Service. Our Marketing and Third-Party Marketing and</p>	<p>Affiliates. Service providers. Other individuals or companies at your request. Third parties, such as third-party advertisers and</p>

<p>nationality, ancestry or ethnicity, and political opinions.</p>		<p>Advertising Purposes. Security, fraud and legal compliance. Editorial uses.</p>	<p>advertising and list brokering networks and analytics providers. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales or transfers of our business or assets.</p>
<p><b>Device information and identifiers</b></p> <p>such as IP address; browser type and language; operating system; platform type; device type; software and hardware attributes; and unique device, advertising, and app identifiers.</p>	<p>You (through your device). Advertising providers. Analytics providers. Cookies and tracking technologies.</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Facilitating payment. Personalizing content and your experience. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance. Editorial uses.</p>	<p>Service providers. Affiliates. Other individuals, services, and partners at your request. Other third parties, such as third-party advertisers and advertising and list brokering networks. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>
<p><b>Internet network and electronic activity device information</b></p> <p>such as information about files you download, domain names, landing pages, browsing activity, content or ads viewed and clicked, dates and times of access, pages viewed, forms you complete or partially complete, search terms, uploads or downloads, the URL that referred you to our Services, the web sites you visit after this web site; if you share our content to social media platforms; and other web usage activity and data logged by our web servers, whether you open</p>	<p>You (through your device). Advertising providers. Analytics providers. Cookies and tracking technologies. Marketers. Our affiliates.</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Personalizing content and your experience. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance. Editorial uses.</p>	<p>Service providers. Affiliates. Other individuals, services, and partners at your request. Other third parties, such as third-party advertisers and advertising and list brokering networks. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of transfers of our business or assets.</p>

<p>an email and your interaction with email content, access times, error logs, and other similar information.</p> <p><b>See “Cookies and other electronic technologies” above for more information about how we collect and use this information.</b></p>			
<p><b>Social media information (which may include personal identifiers, photos, location, user generated content, demographic information).</b></p> <p>If you link your account or access the Services through a third-party connection or log-in, we may have access to any information you provide to that social network depending on your privacy settings, such as your name, email address, friend list, photo, gender, location, and current city; and information you provide to us directly through our pages on social networking and blogging platforms (e.g., Facebook, Instagram, YouTube, and Twitter).</p>	<p>You, if you choose to provide to us. Social media networks, in accordance with your privacy preferences on such services.</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Personalizing content and your experience. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Services. Security, fraud and legal compliance. Editorial uses.</p>	<p>Service providers. Affiliates. Other individuals, services, and partners at your request. Other third parties, such as third-party advertisers and advertising and list brokering networks. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary. Third parties for sales of our business or assets.</p>
<p><b>Location information</b></p> <p>such as general location, and, if you provide permission, precise GPS location.</p>	<p>You, if you choose to provide to us. Your use of our services/automatically collected from you. Third parties (such as service providers).</p>	<p>Providing the Services, including registration and customer service. Fixing and improving the Services. Personalizing content and your experience. Our Marketing and Third-Party Marketing and Advertising Purposes. Bug detection and error reporting. Analyzing and improving the Services.</p>	<p>Service providers. Affiliates. Other individuals, services, and partners at your request. Other third parties, such as third-party advertisers and advertising and list brokering networks. Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p>

		Security, fraud and legal compliance.	Third parties for sales of transfers of our business or assets.
<p><b>Sensory information</b></p> <p>such as audio recordings if you call our customer service or volunteer this information as part of using our Services.</p>	<p>You, if you choose to provide to us.</p> <p>Your use of our services/automatically collected from you.</p> <p>Third parties (such as service providers).</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Facilitating payment.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p>	<p>Service providers.</p> <p>Affiliates.</p> <p>Other individuals, services, and partners at your request.</p> <p>Other third parties, such as third-party advertisers and advertising and list brokering networks.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>
<p><b>Research, survey, or sweepstakes information (including personal identifiers and user generated content)</b></p> <p>collected if you participate in a survey or sweepstakes; includes information needed for you to participate (such as contact information), and to fulfill your prize.</p>	<p>You, if you choose to provide to us.</p> <p>Survey or sweepstakes partners.</p> <p>Researchers and analysts.</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Personalizing content and your experience.</p> <p>Our Marketing and Third-Party Marketing and Advertising Purposes.</p> <p>Bug detection and error reporting.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p> <p>Editorial uses.</p>	<p>Affiliates.</p> <p>Service providers.</p> <p>Other individuals or companies at your request.</p> <p>Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.</p> <p>Third parties for sales of transfers of our business or assets.</p>
<p><b>Personalization data about you</b></p>	<p>You, if you choose to provide to us.</p> <p>Your use of our services/automatically collected from you.</p> <p>Affiliates.</p> <p>Third parties (such as Data Brokers).</p>	<p>Providing the Services, including registration and customer service.</p> <p>Fixing and improving the Services.</p> <p>Personalizing content and your experience.</p> <p>Our Marketing and Third-Party Marketing and Advertising Purposes.</p> <p>Analyzing and improving the Services.</p> <p>Security, fraud and legal compliance.</p>	<p>Affiliates.</p> <p>Third parties (such as service providers).</p>

<p><b>Other information</b></p> <p>any other information you choose to directly provide to us in connection with your use of the Services.</p>	<p>You, if you choose to provide to us.</p>	<p>Providing the Services, including registration and customer service.          Fixing and improving the Services.          Facilitating payment.          Personalizing content and your experience.          Our Marketing and Third-Party Marketing and Advertising Purposes.          Bug detection and error reporting.          Analyzing and improving the Services Security, fraud and legal compliance.          Editorial uses.</p>	<p>Service providers.          Affiliates.          Other individuals, services, and partners at your request.          Other third parties, such as third-party advertisers and advertising and list brokering networks.          Third parties relating to legal requests, if required by law or if we believe in good faith that it is reasonably necessary.          Third parties for sales of transfers of our business or assets.</p>
<p><b>Health or education information</b></p>	<p>You, if you choose to provide it to us.</p>	<p>Successful Aging event.          Editorial uses.</p>	<p>Service providers.          Affiliates.          Other individuals, services, and partners at your request.</p>

As a California resident, you may have the rights listed below in relation to personal information we have collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

- **Right to Know Request.** You have a right to request the following information about our collection, use and disclosure of your personal information over the prior 12 months and ask that we provide you with a copy of the following information:
  - categories of and specific pieces of personal information we have collected about you;
  - categories of sources from which we collect personal information;
  - the business of commercial purposes for collecting personal information;
  - categories of third parties to whom the personal information was disclosed for a business purpose; and
  - categories of personal information disclosed about you for a business purpose.
- **Right to Delete Request.** Under the CCPA, you have a right to request that we delete personal information, subject to certain exceptions.

You may make a request to know or delete by emailing [privacy@simwinsports.io](mailto:privacy@simwinsports.io). We may need to collect information from you to verify your identity, such as your email address, government issued ID or date of birth, before providing a substantive response to the request. You may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we

will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

We will not discriminate against you for exercising any of your rights under the CCPA.

#### 11. INTERNATIONAL USERS

We are based in the United States. The Platform is for individuals located throughout the world, so if you access the Platform from outside the United States, we want to remind you that our handling of information about you will be subject to United States data privacy laws.

#### 12. HOW TO CONTACT US

Should you have any questions about our privacy practices or this Privacy Policy, please email us at [privacy@simwinsports.io](mailto:privacy@simwinsports.io) or contact us at PO Box 271064, Flower Mound, TX 75027, by e-mail at [support@simwinsports.io](mailto:support@simwinsports.io).