

Privacy Statement

Last modified: February 16, 2024

Introduction

FeatsClub Inc. ("**FeatsClub**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this Privacy Statement.

This Privacy Statement describes the types of Personal Information we may collect from you or that you may provide when you use our application (the "**App**") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

"Personal Information" as used in this Statement means information that identifies, relates to, describes, or can reasonably be linked, directly or indirectly, to a specific natural person. It does not include information that is considered anonymous, de-identified, or aggregated by applicable law.

This Privacy Statement applies to the information we collect:

- On the App
- In email, text, and other electronic messages between you and FeatsClub.
- When you interact with our advertising on third-party Apps and services, if those applications or advertising include links to this Privacy Statement.

Please read this Privacy Statement carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our App. By accessing or using the App, you agree to this Privacy Statement. This Privacy Statement may change from time to time. Your continued use of the App after we make changes is deemed to be acceptance of those changes, so please check the Privacy Statement periodically for updates.

Children Under the Age of 13

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this section, "**parents**") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("**children**"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information.

This section notifies parents of:

- The types of information we may collect from children.
- How we use the information we collect.
- Our practices for disclosing that information.
- Our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent.

- All operators that collect or maintain information from children through this FEATSCLUB App.

This section only applies to children under the age of 13 and supplements the other provisions of this privacy policy.

Information We Collect from Children

App and its content and features are only available to registered users. In addition, we use certain technologies, such as cookies, to automatically collect information from our users (including children) when they visit or use the App.

We only collect as much information about a child as is reasonably necessary for the child to participate in an activity, and we do not condition his or her participation on the disclosure of more personal information than is reasonably necessary.

Information We Collect Directly. A child must provide us with the following information to register with the App:

- Name
- Gender
- Photo
- Email address
- Phone number
- Birthdate
- Extracurricular interests, activities, skills, and achievements
- A screen or user name that functions as online contact information

We also require the child to create a member name and password. We may request additional information from your child. We specify whether information is required or optional when we request it.

We enable registered users to communicate with others on or through this App through chat, and posting to public areas of the Service ("**Social Features**"). The nature of these features allows children to disclose personal information about themselves. We do not monitor or review this content before it is posted, and we do not control the actions of third parties with whom your child shares his or her information. We encourage parents to educate their children about safe internet use and to monitor their children's use of social features.

Automatic Information Collection and Tracking. We use technology to automatically collect information from our users, including children when they access and navigate through the App and use certain of its features. The information we collect through these technologies may include:

- One or more persistent identifiers that can be used to recognize a user over time and across different websites and online services.
- Information that identifies a device's location (geolocation information).

We may combine non-personal information we collect through these technologies with personal information about you or your child that we collect online.

For information about our automatic information collection practices, including how you can opt out of certain information collection, see the " Information We Collect Through Automatic Data Collection Technologies," "Choices About How We Use and Disclose Your Information," and "California & Other U.S. State Privacy Rights " sections of our general Privacy Policy.

How We Use Your Child's Information

We use the personal information we collect from your child to:

- Register him or her with the Service;
- Communicate with him or her about activities or features of the App that may be of interest;
- Track his or her performance in games or other activities;
- Provide services he or she requested;
- Market new academies or coaches, volunteering opportunities, or part-time roles to children.

We use the information we collect automatically through technology (see Automatic Information Collection and Tracking) and other non-personal information we collect to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about the child's preferences, allowing us to customize the content according to individual interests.
- Speed up your searches.

We use geolocation information we collect to provide relevant information on local academies, coaches, events, venues, and other information that will benefit users.

Our Practices for Disclosing Children's Information

We do not share, sell, rent, or transfer children's personal information other than as described in this section.

We may disclose aggregated information about many of our users and information that does not identify any individual or device. In addition, we may disclose children's personal information:

- To third parties we use to support the internal operations of our App and who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of FeatsClub and our customers or others, including to:
 - protect the safety of a child;
 - protect the safety and security of the App; or
 - enable us to take precautions against liability.
- To law enforcement agencies or for an investigation related to public safety.

In addition, if we are involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of FeatsClub's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding or event, we may transfer the personal information we have collected or maintain to the buyer or other successor.

Social Features. The App offers social features, including chat and posting on message boards that enable children to communicate with others through the App. We do not control the types of information your child can send or post through them. We encourage parents to educate their children about safety online and to carefully monitor their children's use of social features to ensure they do not disclose their personal information through them.

Accessing and Correcting Your Child's Personal Information

At any time, you may review the child's personal information maintained by us, require us to correct or delete the personal information, and/or refuse to permit us from further collecting or using the child's information.

You can review, change, or delete your child's personal information by:

- Logging into your child's account and visiting his or her account profile page.
- Sending us an email at contact@featsclub.com To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

Operators That Collect or Maintain Information from Children

A list of all operators that may collect or maintain personal information from children through the App is available [here](#): Sertifier (www.sertifier.com), Stripe (www.stripe.com).

Please direct your inquiries about any operator's privacy practices and use of children's information to the operator at its contact information provided.

Rights Under The Family Education Rights and Privacy Act (“FERPA”)

Under certain circumstances, if you enroll in a program offered by one of our partnering educational or learning institutions, the information that we may receive from our partnering educational or learning institutions that pertain to you may be protected under FERPA, if applicable. You may also have specific rights related to accessing and/or updating your personal information when FERPA applies. For more information related to the applicability of FERPA and your rights under it, please contact the partner educational or learning institution in which you are or were enrolled.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our App, including information:

- By which you may be personally identified, such as name, email address, telephone number, date of birth, gender, or any other identifier by which you may be contacted online or offline. ("**Personal Information**").
- That is about you, such as skills, activities, and certificates; and/or
- About your internet connection, the equipment you use to access our App, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the App. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties from whom you authorize us to collect data

Information You Provide to Us

The information we collect on or through our App may include:

- Information that you provide by filling in forms on our App. This includes information provided at the time of registering to use our App, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our App.

- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our App and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our App.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the App, or transmitted to other users of the App or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the App with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our App, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our App, including traffic data, location data, logs, and other communication data and the resources that you access and use on the App.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party Apps or other online services, including your behavior data to help surface relevant skills related information and services. Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

The information we collect automatically may include Personal Information, or we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our App and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.

- Recognize you when you return to our App.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our App. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our App.
- **Web Beacons.** Pages of our App and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit FeatsClub, for example, to count users who have visited those pages or opened an email and for other related App statistics (for example, recording the popularity of certain App content and verifying system and server integrity).
- **Flash Cookies.** Certain features of our App may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our App. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).

We may tie information we collect through automatic data collection technologies to Personal Information about you that we collect from other sources or you provide to us.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the App are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies] to collect information about you when you use our App. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different Apps and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).]

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information:

- To present our App and their contents to you.
- To provide you with information, products, or services that you request from us.

- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account/subscription, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our App or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our App.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please adjust your user preferences in your Profile and Account Management sections of App Settings. For more information, see Choices About How We Use and Disclose Your Information.

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

To the extent permitted by applicable law, we also collect, create, process and store information that is not Personal Information such as sets of aggregate data and other de-identified Personal Information that does not reveal your identity. We retain the right to use and disclose information that is not Personal Information in any manner permitted by law.

Disclosure of Your Information

We may disclose Personal Information that we collect or you provide as described in this Privacy Statement:

- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the FeatsClub's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by FeatsClub about our App users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. We contractually require these third parties to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. For more information, see Choices About How We Use and Disclose Your Information.

- To fulfill the purpose for which you provide it. For example, if you give us an email address to use the “connect with organization or expert” or similar collaboration feature of our App, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use <https://www.featsclub.com/termsfuse> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of FeatsClub, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's App. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your Personal Information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by **checking the relevant box** in Profile and Account Management sections of App Settings, or by sending us an email with your request to contact@featsclub.com.
- **Promotional Offers from the FeatsClub.** If you do not wish to have your **[email address/contact information]** used by the FeatsClub to promote our own or third parties' products or services, you can opt-out by or at any other time by **checking the relevant box** in Profile and Account Management sections of App Settings, or by sending us an email with your request to contact@featsclub.com. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the FeatsClub as a result of a product purchase, product service experience or other transactions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience

preferences, you can opt-out by [OPT-OUT METHOD]. [For this opt-out to function, you must have your browser set to accept all browser cookies.]]

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's App.

Residents of certain states, such as California, Nevada, Colorado, Connecticut, Virginia, and Utah may have additional Personal Information rights and choices. Please see sections below for more information.

Accessing and Correcting Your Information

You can review and change your Personal Information by logging into the App or the Application and visiting your account profile page.

You may also send us an email at contact@featsclub.com to request access to, correct or delete any Personal Information that you have provided to us. We cannot delete your Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the App, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other App users.

Residents of certain states, such as California, Nevada, Colorado, Virginia, Connecticut and Utah may have additional Personal Information rights and choices. Please see the sections below for more information.

California & Other U.S. States Notice at Collection

FeatsClub may collect the following categories of personal data.

Category	Examples	Collected
A. Identifiers.	A real name, alias, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, telephone number, bank account number, credit card number, debit card number, or any other financial information,. Some Personal Information included in this category may overlap with other categories.	YES

F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a App, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Sources: We receive information from sources as described in the “Information We Collect About You and How We Collect It” section.

FeatsClub’s business and commercial purposes for use: FeatsClub uses personal data for the following business and commercial purposes: to provide FeatsClub services; for product research and development; for marketing and promotions; authentication, integrity, security, and safety; to communicate with you; and for legal reasons. For more information, please see “How We Share Personal Data?”

Categories of third parties to whom we disclose Personal Information for business purposes are described in “Disclosure of Your Information”.

FeatsClub may permit advertising and analytics services that are intended to deliver advertising to you and/or analyze your interactions, based on your interactions with our App or app which may constitute a “sale” or “sharing” of data for targeted advertising purposes under certain state privacy laws. See “California & Other U.S. State Privacy Rights” for more information regarding your right to opt-out.

Retention: FeatsClub retains personal data for as long as required to engage in the uses described in this Privacy Statement, unless a longer retention period is required by applicable law or is advisable in light of our legal position (such as in regard to the enforcement of our agreements, the resolution of disputes, and applicable statutes of limitations, litigation, or regulatory investigation).

California & Other U.S. State Privacy Rights

Under some U.S. state laws, including the California Consumer Privacy Act of 2018 (as amended by the California Consumer Privacy Rights Act) (CCPA), residents may have a right to:

Access the categories and specific pieces of personal data FeatsClub has collected, the categories of sources from which the personal data is collected, the business purpose(s) for collecting the personal data, and the categories of third parties with whom FeatsClub has shared personal data,

and obtain the personal data in a portable and, to the extent technically feasible, readily usable format;

Delete personal data under certain circumstances;

Correct personal data under certain circumstances; and

Opt out of the “sale” of personal data or “sharing” of personal data for targeted advertising purposes. We do not sell your personal data in the conventional sense. However, like many companies, we may use advertising and analytics services that are intended to analyze your interactions with our App or app, based on information obtained from cookies or other trackers, including for delivering advertising to you (such as interest-based, targeted, or cross-context behavioral advertising). You can get more information and opt out of the use of cookies and other trackers on our App by changing settings in Profile and Account Management sections of App Settings, or by sending us an email with your request to contact@featsclub.com. You will need to set your preferences from each device and each web browser from which you wish to opt out. This feature uses a cookie to remember your preference, so if you clear all cookies from your browser, you will need to re-select your preferred settings. California and Connecticut residents may also set the **Global Privacy Control** (GPC) to opt out of the “sale” or “sharing” of your Personal Information for targeted advertising for each participating browser system that you use. FeatsClub does not have actual knowledge that it “sells” or “shares” the Personal Information of consumers under 16 years of age.

Appeal a denial of your request. Some states provide additional rights to their residents. If we decline to process your request, you may have the right to appeal our decision. You can do so by replying directly to our denial or emailing contact@featsclub.com.

FeatsClub will not discriminate against you for exercising any of these rights, which is further in line with your rights under state law.

Sensitive Information. FeatsClub receives information that may be considered sensitive under some state laws, such as certain Account Information (e.g., financial information, log-in information). FeatsClub processes sensitive Personal Information to provide FeatsClub services, for product research and development, for authentication, integrity, security, and safety reasons, to communicate with you, for legal reasons, and with your consent. FeatsClub does not use or disclose sensitive Personal Information (as defined under CCPA) for purposes of inferring characteristics about a consumer, or in any way that would require FeatsClub to provide a right to limit under the CCPA. Under certain laws, residents may also be permitted to opt out of certain profiling relating to automated processing analyzing certain categories of an individual’s information that would produce a legal or similarly significant effect. FeatsClub does not engage in this type of profiling of individuals.

To exercise your rights, you can either contact us using the contact details provided under the “Contact Information” heading below or using the Form by submitting the required verifying information. To opt out of the use of cookies on our sites for interest-based advertising purposes, follow the instructions above.

We will acknowledge receipt of your request within 10 business days, and provide a substantive response within 45 calendar days, or inform you of the reason and extension period (up to a total of 90 days) in writing.

These rights are not absolute, are subject to exceptions and limitations, and may not be afforded to residents of all states. In certain cases, we may decline requests to exercise these rights where permitted by law. We will need to verify your identity to process your access, deletion, and correction requests and reserve the right to confirm your state residency. To verify your identity, we may require you to log into your existing FeatsClub account (if applicable), give a declaration as to your identity under penalty of perjury, and/or provide additional information, such as providing at least two pieces of Personal Information relating to your account (which will be compared to information we have, such as profile information) or as we otherwise may already have in our possession, such as your email address and phone number. We will verify your consumer request by comparing the information you provide to information already in our possession, and take additional steps to minimize the risk of fraud. You may designate an authorized agent to submit your verified consumer request by providing written permission and verifying your identity, or through proof of power of attorney.

California's Shine the Light Law

California Civil Code Section 1798.83, also known as "Shine The Light" law, permits California residents to annually request information regarding the disclosure of your Personal Information (if any) to third parties for the third parties' direct marketing purposes in the preceding calendar year. We do not share Personal Information with third parties for the third parties' direct marketing purposes.

Virginia Consumer Data Protection Act De-identified Data Disclosure. We may use de-identified data in some instances. We either maintain such data without attempting to re-identify it or treat such data as personal data subject to applicable law. We will only use personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. However, if we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity and for security or fraud-prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

Data Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and related information will be encrypted.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App and Application, you

are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the App like message boards. The information you share in public areas may be viewed by any user of the App.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our App or Application. Any transmission of Personal Information is at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on the App or Application.

Changes to Our Privacy Statement

It is our Privacy Statement to post any changes we make to our Privacy Statement on this page. If we make material changes to how we treat our users' Personal Information, we will notify you either by email to the email address specified in your account or through a notice on the App home page, or through push messaging. The date the Privacy Statement was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our App and this Privacy Statement to check for any changes.

Contact Information

To ask questions or comment about this Privacy Statement and our privacy practices or express your concerns, please contact us at: contact@featsclub.com or +1 314 629 9754.

If you have complaints about our processing of your personal information, you may have the right to contact the applicable supervisory authority.