

# PRIVACY POLICY Last Updated: March 1, 2025

LFG Sports.AI, LLC d/b/a LFG Sports.AI ("LFG Sports.AI", "we", "our", "us") values your rights to privacy and security, and is committed to you and protecting your privacy rights. The foregoing Privacy Policy (the "Privacy Policy") is set forth to describe how we collect, use, and share end user information in our possession to operate, improve, develop, and protect our Platform (including Software Application(s), Website(s), and Services) (collectively, the "Platform" or the "Service"), as well as your other interactions with the Services; LFG Sports.AI allows users to participate in betting predictions, link to betting sites, sync and share their betting activity with others and chat in groups regarding their activities, and much more. While we only collect and track the minimum information necessary to provide users with an enhanced experience while visiting or utilizing our Platform, by visiting our Platform or providing your Personal Information to us by any means, you are giving your consent to our collection, use and disclosure thereof as described herein. Please take some time to read this Policy carefully.

## 1. THE INFORMATION WE COLLECT

- a. While operating the Platform, we may collect certain information, which is further set forth below. Much of the content and tools we offer is free and does not require any sort of user registration, therefore no personal information is gathered from you. However, to enhance your experience on our Platform, subscribe to different membership levels and/or access certain areas of our Service, LFG Sports.AI may require you to register for an account and provide certain information.
- **b.** Information You Provide to Us and Provided by Others
  - When you register for the Platform to create an account, or contact us, you will be required to provide us with certain personal information about yourself (the "Personal Information"). LFG Sports.AI may also collect your personal data when third parties such as our service providers (e.g., our advertising service providers) and business partners (e.g., companies integrating with our Service) provide us with Personal Data about you, or when Personal Data is automatically collected through your use of our Service. Such Personal Information is data that can reasonably be used to identify, relate to or describe you, which may include your name, physical address, e-mail address, phone number(s), credit card information and other information. We may also collect information that you voluntarily provide to us, such as household income range, personal interests, and product and service preferences. If you register for the Platform using your Facebook or any other social media account provided by a social media service, we may collect, store, and use all information provided to us by the social media service in accordance with the terms of its privacy policy. Such information may include, without limitation, your first and last name, username, profile picture, unique social media identifier and access token, and e-mail address.
  - We collect (and store) the following Personal Data from you in connection with the Service:
    - 1. Contact Information: Information we collect to identify or contact you, such as first name, last name, home/billing/physical address, e-mail address, telephone number (e.g., basic information collected when you register for an account on the site).
    - 2. Transaction Information: As a Member, when you make a Transaction, we will collect information about the Transaction you conduct on the Service, including the date and time of the Transaction, the Transaction amount, the bet(s) placed and the institution involved in the transaction (the "Transaction Information"), as well as when you subscribe or sign up for special offers and all interactions with the service (e.g., the functionality used and links clicked for the Service). As part of using the Platform, you will be given the option to link your betting accounts to your LFG Sports.AI account. LFG Sports.AI does not collect or obtain access to your payment or financial information, nor does it facilitate the act of betting in any financial capacity. Rather, LFG Sports.AI may route you to a legal betting operator in your territory.



- **3.** <u>User Content</u>: Information is collected should you choose to input Personal Data as part of content, images, comments or other information in relation to the Service, as well as materials you may choose to post to or through the Service.
- 4. <u>User Account and Device Information</u>: Information we collect that identifies you individually to the Service and Platform, such as your username, email address, password, IP address and Log files (e.g., this information may be used to authenticate you during log in, and the IP address may be used to help maintain your sit security and account preferences while using the Service); further, information may be collected about the devices you are using to access the Service, including type of device, operating system and version used, device settings, application IDs, unique identifiers and crash data. We may collect additional information automatically when you visit and/or use the Platform including your IP address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, details about your browser, operating system or device, location information, Internet service provider, pages you've visited before, during and after using the Platform, information about links you click, etc.
  - a. We may collect data regarding your use of the Platform, such as the types of content you interact with, information from your Groups and your User Content (including other Members with whom you interact, topics you discuss with Groups, anything else you post or interact with via the Platform) and the frequency, duration, and timing of your activities. We may combine your information with information provided by others when they use our Platform. LFG Sports.AI (as well as third parties that provide content, advertising, or other functionality on the Platform) may use cookies, pixel tags, local storage, and other technologies ("Technologies") to automatically collect information through the Platform (i.e., small data files placed on your devices allowing us and third parties to record certain pieces of information whenever you visit or interact with our Platform).
    - i. Cookies are small text files placed in web browsers to store preferences. Most browsers allow you to block and delete cookies (Note: blocking and/or deleting cookies may cause the Platform to not work properly). Certain cookies may be temporary and are stored on your device only while you are visiting the Website or while using the Service ("Session Cookies"); others may be stored on your device for a period of time after you leave the Website or after using the Service ("Persistent Cookies"). Persistent Cookies are used to store how often you visit our Service, your account preferences so you may access them on the next visit and how your use of the Service varies over time; they are also used to analyze advertising efforts for our advertising partners advertising on our Platform.
    - ii. Pixel Tags (also known as a web beacons) are pieces of code embedded in the Platform which collects information about engagement (e.g., using a pixel so that we could record your visit to a certain web page or that you clicked on a particular advertisement).
  - **b.** We may also use Google Analytics and other service providers to collect information regarding behaviors and demographics on the Platform. For more information about Google Analytics, please visit <a href="www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>. You can opt out of Google's collection and processing of data generated by your use of the Platform by going to <a href="http://tools.google.com/dlpage/gaoptout">http://tools.google.com/dlpage/gaoptout</a>.
- ii. There is also Personal Data that we request from you when using our Service that we do **NOT** store:
  - 1. <u>Financial Account Information</u>: Information that you provide in connection with your purchase of the Service or any purchase made through the Service (including card number, expiration date and verification code). Users must only provide LFG Sports.AI with Financial Account Information for accounts and cards that such user has the lawful right to access. This information may be stored and processed by our payment processing partner (please contact us if you wish to obtain information for said processing partner's Privacy Policy).



## 2. HOW WE USE AND SHARE THE INFORMATION COLLECTED

- **a.** We use Personal Data, Personal Information, Transaction Information and other Information (collectively, "Information") for legitimate business purposes as necessary to provide users with the Service or to improve our business and operations (which may include processing Information based on the consent users expressly grant when we collect such data), which purposes include those necessary to:
  - i. fulfill our contract with the user;
  - ii. process information to facilitate the user's use of the Platform;
  - iii. operate and improve our business, products and services;
  - iv. manage user information;
  - v. personalize user experience on the Platform;
  - vi. send users an SMS messages for purposes of authentication;
  - vii. solicit user feedback:
  - viii. provide and answer requests for customer or technical support;
  - ix. respond to questions, comments and other requests;
  - **x.** provide access to certain areas, functionalities and features of the Platform;
  - xi. provide users with tailored content and advertisements and market our products;
  - xii. verify eligibility to enter certain promotions or contests;
  - xiii. pursue legitimate interests, such as direct marketing, research and development;
  - xiv. measure interest and engagement in the Platform;
  - xv. develop new products and services;
  - xvi. provide and improve our products and the Platform/Services;
  - **xvii.** ensure internal quality control and safety;
- xviii. authenticate and verify individual identity;
  - xix. ensure network and information security;
  - **xx.** conduct audits:
  - **xxi.** communicate with users about activities on the Platform and changes to our agreements;
- **xxii.** prevent and prosecute potentially prohibited or illegal activities;
- **xxiii.** complete corporate transactions;
- xxiv. enforce our agreements;
- xxv. protect from and prevent fraud and security threats; and
- **xxvi.** comply with applicable laws, regulations, and legal obligations and process.
- **b.** E-Mail. Information we collect may be used to notify users regarding LFG Sports.AI services, advise of special offers and provide updates on functionality changes. If you do not want to receive this information or would like to opt-out of any notifications, use the link at the bottom of our emails and adjust your account settings via the account profile page to unsubscribe.
- c. Your Transaction Information is automatically made public to all Members of LFG Sports.AI and all Groups or direct messages in which you are a member. You may adjust the amount of Information we share with other Members by visiting your personal privacy settings; however, it is LFG Sports.AI's purpose to provide an opportunity for Members to share betting activity with other Members, therefore, certain aspects of your Transaction Information cannot be made private. In our ongoing effort to better understand our users and our Platform, we may analyze the Information in de-identified and/or aggregate form to operate, maintain, manage, and improve the Platform; such information does not identify you personally. We may share, sell, and/or license this de-identified and/or aggregate data with our affiliates, agents, and business partners, and other third parties. We may also disclose aggregated user statistics to describe our products and Platform to current and prospective business partners and to other third parties for other lawful purposes. We may share your Information regarding usage and consumption of purchased content with payment partners (Apple, Google and our payment processor) as part of our efforts to manage purchase and assist in related processes. We may share your Information with any of our parent companies, subsidiaries, joint ventures, or other companies under common control with us. As



we develop our business, we might sell or buy businesses or assets. If a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event occurs, the Information may be part of the transferred assets. To the extent permitted by applicable law, we may disclose the Information when required by law, court order, or other government or law enforcement authority or regulatory agency, or whenever we believe in good faith that disclosing such Information is necessary or advisable (e.g., to protect the rights, property, or safety of LFG Sports.AI, our users, the public and/or others).

## 3. YOUR CHOICES

- **a.** You have choices about the Personal Information you provide. Where you have consented to the processing of your Personal Information, you may withdraw said consent at any time and prevent further processing by contacting us as described below (though doing so may limit your ability to use certain features or request certain services or products). If you opt out, we may still collect and use non-personal information regarding your activities on the Platform and for other legal purposes as described above.
- **b.** Except as otherwise set forth herein, we will not share, disclose, or sell your Personal Information or information relating to transactions ("Transactional Information") with non-affiliated third parties that may use such information to market to you, without obtaining your prior opt-in consent (e.g., if we offer you a product opportunity requiring us to share your Personal Information or Transactional Information with non-affiliated third parties that may use such information to market to you). We will obtain your opt-in consent to such sharing of your Personal Information or Transactional Information when we present you with the terms of such offer. If you have opted-in for this kind of sharing, you may: (i) choose to opt-out of by contacting us as set forth below; or (ii) request certain information regarding our disclosure of such information to such non-affiliated third parties by contacting us as set forth below. Further, if you would like to opt-out of LFG Sports.AI's sharing of your Information with its affiliates to use said Information to market to you, please contact us as set forth below.
- c. You may access, review, and make changes to your Personal Information by following the instructions found on the Platform. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any LFG Sports.AI marketing email; however, you cannot opt out of receiving transactional e-mails related to their account (instead you can delete your account and/or change your email).
- d. We may send you push notifications through our mobile application. You may at any time change your preferences from receiving these types of communications by changing the settings on your mobile device. We may also collect location-based information if you use our mobile applications. You may update this by changing the settings on your mobile device. You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs (to access these and learn more about targeted advertising and consumer choice and privacy, visit <a href="http://www.aboutads.info/choices/">http://www.aboutads.info/choices/</a> and <a href="https://www.networkadvertising.org/managing/opt">www.networkadvertising.org/managing/opt</a> out.asp).
- e. To separately make choices for mobile apps on a mobile device, you can download DAA's AppChoices application from your device's app store. Alternatively, for some devices you may use your device's platform controls in your settings to exercise choice. Please note you must separately opt out in each browser and on each device. Advertisements on third party websites that contain the AdChoices link may have been directed to you based on information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners' use of this information for interest-based advertising purposes.

## 4. YOUR PRIVACY RIGHTS

**a.** In accordance with applicable law, you may have the right to:



- i. access Information about you if legally required (you may also have the right in some cases to receive or have your electronic Information transferred to another party);
- ii. request correction of your Personal Information where it is inaccurate or incomplete;
- iii. request deletion of your Personal Information, subject to certain exceptions prescribed by law; and
- iv. request restriction of or object to processing of your Personal Information, including the right to opt in or opt out of the sale of your Personal Information to third parties, if applicable, where such requests are permitted by law. If you would like to exercise any of these rights, please log into your account or contact us as set forth below. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

## 5. YOU CAN REQUEST REMOVAL OF YOUR INFORMATION FROM OUR SYSTEMS ANY TIME

- **a.** You can contact us to have your data removed from our systems by requesting an account deletion, which will remove your name, email address and any other information stored in our systems; however, for legal and reporting purposes, your transaction history will be saved but will not be associated with you.
- **b.** You can also request that we provide a file containing your personal information stored in our systems by contacting our customer support team.

## 6. HOW WE PROTECT YOUR INFORMATION

- a. We recognize industry standards, implement security measures and take commercially reasonable steps to ensure security of Information from loss, misuse and unauthorized access, disclosure, alteration, or destruction. We maintain physical, electronic and procedural safeguards that comply with applicable laws and regulations to guard non-public personal financial information from unauthorized access, use and disclosure. Your personal information is contained behind secured networks, only accessible by a employees with special access rights to use for such things as diagnostic or customer service purposes.
- **b.** To ensure compliance with the latest security technology, we recommend using one of the following browsers and keeping them updated (each browser may be downloaded free of charge):
  - i. Google Chrome: <a href="https://www.google.com/crome">https://www.google.com/crome</a>
  - ii. Mozilla Firefox: <a href="https://www.mozilla.org/en-US/firefox/new">https://www.mozilla.org/en-US/firefox/new</a>
- **c.** By voluntarily posting in public areas of the Internet (including our Website or Service), you make that information available to the public; always be cautious when publicly disclosing personal information.
- d. No security system is impenetrable or fail safe. When you submit information over the Internet to any website or entity, the information passes through multiple networks and systems; however, not all systems are under our control, and information may therefore be intercepted. While we make best efforts to protect your information, LFG Sports.AI cannot warrant the security of Information you transmit, and cannot guaranty such Information will not be intercepted while being transmitted to and from us over the Internet. You provide Information and use our Website, Platform and Service at your own risk.

# 7. CALIFORNIA-SPECIFIC PRIVACY RIGHTS

- **a.** If you are a California resident, California law requires us to provide information regarding how we collect, use and share "personal information" per the California Consumer Privacy Act ("CCPA").
  - i. Use & Disclosure of Categories of Personal Information:
    - 1. Throughout this Privacy Policy, we discuss in detail specific pieces of personal information we collect from and about users. Under the CCPA we are also required to provide you with the "categories" of personal information we collect, which categories are:
      - **a.** Identifiers (e.g., name and email address);
      - **b.** Commercial Information (e.g., subscription data or league information);
      - c. Internet or Other Network or Device Activity (e.g., browsing history or Services usage);
      - **d.** Geolocation Information (e.g., your city and state based on IP address);
      - e. Inference data about you; and



- f. Other information that identifies or can be reasonably associated with you.
- ii. How we Use and Disclose these Categories of Personal Information:
  - 1. If you are a California resident, the CCPA allows you to make certain requests about your personal information; specifically, the CCPA allows you to request:
    - a. Information about categories of personal information we collect or disclose about you; the categories of such information; the business or commercial purpose for collecting such information; and the categories of third parties with whom we share/disclose personal information. All such information is also set forth in this Policy.
    - **b.** That we provide access to and/or a copy of certain information we hold about you.
    - **c.** To delete certain information we have about you.
    - **d.** That we provide you with information about the financial incentives we offer to you (if any).
  - 2. The CCPA further grants you the right to not be discriminated against (as provided for under applicable law) for exercising your rights. We will consider all requests and provide a response within the time period required by applicable law; however, certain information may be exempt from such requests, such as if we need to keep processing your information or to comply with a legal obligation. We will advise you if this is the case or if certain rights don't apply in your country or state of residence. We will take reasonable steps to verify your identity before responding to a request, which may include (at a minimum, depending on the sensitivity of the information requested and type of request being made) verifying your name and email address. You may also designate an authorized agent to submit certain requests on your behalf; for any authorized agent to be verified, you must provide said agent with signed, written permission to make such request or a Power of Attorney. We may also follow up with you to verify your identity before processing the authorized agent's request. If you exercise your right to delete you may no longer be able to use the Service. If you would like further information regarding your legal rights under California law or would like to exercise any such rights, please contact us.
- **b.** Notice of Right to Opt Out of Sale of Personal Information.
  - i. California residents may opt out of the "sale" of their personal information, which is broadly defined to include when we share your information with third parties, such as sports leagues or teams, to provide you with offers and promotions. It may also include allowing parties to receive certain information, such as cookies' IP address and/or browsing behavior to deliver targeted advertising on the Services or other services. Advertising (including targeted advertising) enables us to provide you certain content for free and allows us to provide you offers which may be relevant to you.
  - ii. Depending on the Services you use, we may provide information to third parties for:
    - 1. Online targeted advertising (demographic, statistical, geolocation and social media information, user-generated content, device information and identifiers, and connection/usage data).
    - 2. Sharing with third parties to send you offers and promotions (contact and account registration information, demographic and statistical information user-generated content and geolocation).
  - **iii.** If you would like to opt out of our use of your information for such purposes that are considered a "sale" under California law, you may do so as outlined herein. You can also submit a sale opt-out request to our customer support team. (Note: we do not knowingly sell the personal information of minors under 18 years of age without legally required affirmative authorization).

# 8. THIRD PARTIES, EXTERNAL WEBSITE LINKS AND CO-BRANDED PARTNERSHIPS

a. To provide increased value to our visitors, LFG Sports.AI may select third-party web sites to link to, link from and frame within our Website and Service, such that the Platform may contain links to third-party websites. We participate in co-branding and other relationships to offer e-commerce and other services and features to its users and allow third-party companies to place advertisements and/or collect certain anonymous information when you visit our Platform; these companies typically use a cookie or third-party web beacon to collect data and may use non-personally identifiable information (e.g., click data,



browser information, time and date, interaction with advertisements, number of ad impressions) during your visits to this and other websites to provide ads about goods and services likely to be of interest to you. However, even if a third-party is affiliated with LFG Sports, we have no control over those linked sites' privacy practices or the content of any of our business partners, advertisers, sponsors, or other websites to which we provide links, and therefore take no responsibility or liability for those independent policies or actions and are not responsible for the content or the privacy policies of those third-party websites. Always check the applicable third-party privacy policy and terms of use when visiting any other websites to ensure you are comfortable with the privacy practices of each site you visit before providing your personal information. Linked sites are for your convenience; you access them at your own risk.

- **b.** We make public commenting available to you on our Platform; please remember that we do not control the information shared by Members and anything you voluntarily provide in any public area of the internet will be publicly available to other visitors on that website and potentially to other third parties. Always be cautious when publicly disclosing personal information.
- **c.** To see any third-party privacy policies or opt out of some tracking cookies that will be able to identify you on third-party ad networks, review the privacy policies and sites of each such respective partner.

### 9. DATA RETENTION

**a.** We store personal information we receive as described in this Privacy Policy for as long as you use the Platform or as necessary to fulfill the purpose(s) for which it was collected, provide our services on the Platform, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

## 10. IMPORTANT NOTICE TO NON-U.S. RESIDENTS

**a.** The LFG Sports.AI Platform and servers are operated in the United States. Your Information may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction which may not offer the same privacy protections as the laws of the country in which you live. By accessing and using the Platform, you consent to the transfer and processing of your information in the United States. If you are located outside the United States and choose to use the Platform, you do so at your own risk.

## 11. LEGAL AGE REQUIREMENT

**a.** The Platform and Services are not intended for use by people under the legal age required for betting in their jurisdiction (commonly 21 years old, however this varies by jurisdiction). By using the Services, you represent you are of legal age. LFG Sports.AI does not monitor, recognize or honor opt-out or do not track mechanisms, including general web browser "Do Not Track" settings and/or signals.

### 12. YOUR CONSENT & CHANGES TO THIS PRIVACY POLICY

a. By accessing and using our Platform and Services, you consent to the collection and use of information as set forth in this Privacy Policy. This Privacy Policy is effective as of the date stated at the top of this Policy and will always be kept up to date. We may revise this Privacy Policy periodically, which will be reflected by the "Last Updated" date posted above; please revisit this Policy to remain aware of updates. If there is a material revision, we may (in our sole discretion) notify you by contacting you through the email address associated with your account; however, continued access to and use of the Platform and Services after we make any revision(s) constitutes your express acceptance of any modifications hereto.

# 13. HOW TO CONTACT US

a. If you have questions about this Privacy Policy, please contact us at support@lfgsports.ai.