



SciSports Privacy Policy

Version: v1.1
Date: 23 June 2026

This Privacy Policy describes how SciSports Inc. ("Company") collects, uses, discloses, and protects personal information obtained through our websites, applications, and analytics services (collectively, the "Services") offered to users in the United States. By accessing or using the Services, you acknowledge and agree that your personal information will be handled as described in this Policy and in accordance with applicable U.S. federal and state privacy laws.

1. Applicability and Governing Law

This Policy applies to all personal information collected from individuals located in the United States. It is governed by and construed under the laws of the State of Delaware, without regard to conflict-of-laws principles. This Policy operates in conjunction with our General U.S. Terms and Conditions and is subject to federal laws, including the Children's Online Privacy Protection Act ("COPPA"), the Federal Trade Commission Act, and other applicable state privacy statutes.

2. Information Collected

We collect personal information directly from users, automatically through the use of our Services, and from authorized third parties such as coaches, scouts, and clubs.

Information Provided by Users

We collect personal information that you provide to us, including your name, contact details, account credentials, billing information, and any content you upload or transmit through the Services such as match videos, performance data, or player statistics ("User Content").

Information Collected Automatically

When you interact with our Services, we automatically collect certain information such as device identifiers, IP addresses, browser types, operating systems, access dates, usage data, and analytics metrics derived from your interaction with our platform.

Information Obtained from Third Parties

We may receive information from third parties who are authorized to provide it, including coaches, clubs, scouts, business partners, and publicly available databases related to athletic performance or competition statistics.

Information Concerning Children

The processing of data relating to minors aged 13 and older is governed by Section 6 of this Privacy Policy. SciSports does not knowingly collect personal information from children under the age of 13 without verified parental consent as required by COPPA. If we become aware that a child under 13 has created an account without proper authorization, we will promptly delete their information and



terminate their account.

This Policy is written in clear and accessible language and is intended to be readable across all devices and platforms, as required by applicable state privacy laws, including specifically in Delaware and Oregon.

3. Use of Information

We use personal information to operate, maintain, and improve the Services; generate and deliver match analyses, performance reports, and scouting assessments; administer user accounts; process payments; communicate with users regarding account matters, product updates, and legal notices; ensure compliance with applicable law and our General U.S. Terms and Conditions; and conduct internal research and development.

We may display player profiles, performance statistics, rankings, analytics, and related video clips within authenticated areas of the Services to authorized users, including coaches, scouts, and club administrators with appropriate access permissions.

Where a User has provided explicit consent following the conclusion of the Trial Period, we may publish a User's Gravity Card — comprising name, photo, and performance data — on FCElevate.com, a public-facing website operated by SciSports. FCElevate.com publication is not active during the Trial Period. The scope of publication depends on the User's subscription tier and consent selections as described in Section 6.3 of the User Terms & Conditions. For minor users aged 13–17, publication on FCElevate.com requires additional parental or guardian consent as described in Section 6.2 of this Policy.

We may also use de-identified or aggregated data for analytical or statistical purposes, provided such data cannot reasonably be used to identify an individual.

4. Disclosure of Information

We may disclose personal information in the following circumstances.

Authorized Users and Partners

We disclose information to coaches, clubs, scouts, and other authorized users for the purposes of player evaluation, team management, and performance analysis, consistent with the user's account type and permissions.

Service Providers

We engage trusted third-party vendors and processors to perform operational functions on our behalf, including data hosting, analytics, payment processing, customer support, and marketing automation. These providers are contractually bound to process personal information only for authorized purposes and to maintain strict confidentiality and security standards.

Third-Party Service Providers (Analytics, Marketing, CRM, and Tag Management)

We may share limited data with third-party service providers who process information on our behalf for analytics, advertising, and business operations, including the following:

Google Analytics 4 ("GA4") tracks and reports website usage with IP anonymization enabled, and data is not shared with Google for unrelated purposes.

Google Tag Manager facilitates the secure deployment and management of tracking tags and scripts



but does not itself collect personal data.

Stape.io operates as a server-side tag management solution that allows controlled deployment of analytics and advertising pixels in a secure environment.

HubSpot provides marketing automation, email campaign management, and contact segmentation services. Personal data such as newsletter registrations are stored on secure servers located in the United States and the European Union.

Customer.io provides customer engagement, messaging automation, and lifecycle marketing services. Personal data such as email addresses, user identifiers, subscription preferences, and interaction data may be processed to deliver transactional communications, onboarding messages, product updates, and marketing campaigns. Data is processed and stored on secure infrastructure in accordance with applicable privacy laws and contractual data protection obligations.

Stripe provides payment processing, subscription management, and billing services. Personal data such as name, email address, billing information, transaction records, and subscription details may be processed to facilitate payments, manage subscriptions, prevent fraudulent activity, and comply with applicable financial and legal obligations. Payment card information is processed directly by Stripe using industry-standard security measures and is not stored by SciSports.

Apollo.io is used for business development and outreach, managing professional contact information (such as name, organization, and email address) for B2B engagement in accordance with applicable privacy laws.

Advertising platforms including Google Ads, Meta (Facebook and Instagram), LinkedIn, and Microsoft Ads may process pseudonymized data concerning user interactions for the purpose of measuring campaign effectiveness, optimizing delivery, and enabling limited retargeting. These platforms may utilize cookies or comparable technologies to understand usage patterns across websites.

The LinkedIn Insight Tag enables campaign measurement, conversion tracking, and retargeting in accordance with LinkedIn's data policies.

We may also use other comparable analytics, advertising, or business service providers that perform similar functions, provided they are subject to contractual obligations consistent with this Policy.

Legal and Regulatory Requirements

We may disclose personal information when required by law, subpoena, or court order, or where disclosure is necessary to protect our rights, comply with legal obligations, or ensure the safety of users or others.

Business Transfers

In the event of a merger, acquisition, reorganization, or sale of substantially all of our assets, personal information may be transferred to the acquiring or successor entity, subject to the same protections described in this Policy.

We do not sell or share personal information, as those terms are defined under the California Consumer Privacy Act, the Delaware Personal Data Privacy Act, or comparable state privacy statutes. We provide a clear and conspicuous mechanism for consumers to opt out of any sale or sharing of personal information or of targeted advertising should our practices change in the future.

5. Data Security and Retention

We maintain administrative, technical, and physical safeguards to protect personal information from

unauthorized access, alteration, disclosure, or destruction. Data is encrypted where appropriate, stored securely, and accessible only to authorized personnel who are subject to confidentiality obligations.

Personal information is retained for as long as necessary to fulfill the purposes outlined in this Policy or as required by applicable law. When retention is no longer necessary, personal information will be deleted or de-identified in accordance with our internal data retention policies.

6. Children's Privacy

6.1 Users Under 13

The Services do not permit children under the age of 13 to create accounts or access the Platform directly. However, SciSports may receive and process performance data, video footage, and related analytics relating to players under 13 where such data is submitted by an authorized Organization — a club, academy, league, tournament, or showcase — that has contracted with SciSports and warranted that it holds all necessary verifiable parental or guardian consents required under applicable law, including COPPA, for the collection and processing of that child's data.

For players under 13, the following restrictions apply without exception:

- No account creation or platform access is permitted for the player;
- No account creation or platform access is permitted for parents or legal guardians in connection with that player's data;
- Data is accessible solely to authorized coaching and technical staff of the Organization through their verified club administrator account; and
- Data is not used for advertising, behavioral profiling, or any purpose beyond delivering analytics and performance services to the authorized Organization.

Parents or legal guardians of players under 13 who wish to access, correct, or request deletion of their child's data should contact the Organization directly, or contact SciSports at legal@scisports.com. SciSports will verify the request with the relevant Organization before taking action.

6.2 Users Aged 13–17

SciSports operates a platform that is used by players aged 13 and older in connection with sports clubs, academies, leagues, and similar organizations. For users in this age group, the following applies:

(a) Organization Consent. Player data for minor users is provided to SciSports by authorized Organizations — clubs, academies, leagues, tournaments, and showcases — that have contractually warranted to SciSports that they hold all necessary consents for the processing of minor player data, including parental or guardian consent where required by applicable law. SciSports relies on Organizations as the primary and contractually responsible source of consent for minor player data.

(b) Account Creation. When a minor player accepts a platform invitation and creates an account, they confirm at the point of account creation that their parent or legal guardian is aware of their registration and use of the Platform. This confirmation is recorded by SciSports as part of the account creation process.

(c) Trial Period. During the Trial Period, no personal data of minor users is published on FCElevate.com. Full platform access is available during the Trial Period without any FCElevate.com publication being activated.

(d) Payment and Upgrades. Where a minor user's account involves a paid subscription or upgrade,

payment must be completed by a parent or legal guardian. Completion of payment by a parent or legal guardian constitutes their acknowledgment of and agreement to these Terms and this Privacy Policy on behalf of the minor, and their consent to the processing of the minor's personal data as described herein.

(e) FCElevate.com Publication — Free Tier Minor Users. Where a minor user aged 13–17 on the Free tier selects FCElevate.com publication at the subscription selection screen following the Trial Period, publication will not be activated until SciSports receives explicit confirmation from a parent or legal guardian. SciSports will send a confirmation email to the parent email address provided by the minor during account creation. Publication will be activated only upon receipt of affirmative confirmation via that email. Full platform access is not conditional on receipt of this confirmation and continues normally regardless of parental response.

(f) FCElevate.com Publication — Paid Tier Minor Users. For minor users on a Gold or Elite subscription tier, FCElevate.com Gravity Card publication consent — including separate consent for video publication — is obtained from the parent or legal guardian as a required step in the subscription selection or upgrade payment flow.

(g) Data Minimization. SciSports collects and processes only the personal data necessary to provide the Services to minor users. This includes name, email address, performance data, video footage, and analytics, all of which are provided by or through the Organization and are processed solely for the purpose of operating the platform and delivering analytics and scouting services to authorized users.

(h) No Advertising. SciSports does not use personal data of minor users for targeted advertising, behavioral profiling for commercial purposes, or any purpose unrelated to the operation of the Services.

(i) Parental and Guardian Rights. Parents or legal guardians of minor users may at any time:

- Request access to their child's personal data held by SciSports;
- Request correction of inaccurate personal data;
- Request deletion of their child's personal data and account;
- Revoke consent for ongoing data processing; and
- Withdraw consent for FCElevate.com publication.

Such requests may be submitted to legal@scisports.com. SciSports will respond within the timeframe required by applicable law and will verify the identity of the requesting parent or guardian before acting on any request.

(j) Minor Content Deletion and Erasure Rights.

Minor users who are residents of California, and their parents or legal guardians, have the right under California Business and Professions Code §22581 to request removal of content posted by the minor on the Platform. Additional U.S. states have enacted or are enacting comparable rights for minor users, and SciSports extends this process to all minor users regardless of state of residence, and to minor users located in Canada.

Scope of this right: This right applies to content directly uploaded or posted by the minor user through their own account, including video clips, profile information, and any other materials submitted by the minor. It does not apply to:

- Content submitted to SciSports by an Organization on the minor's behalf, which is governed by the Organization's agreement with SciSports and the consents obtained by the Organization;
- Analytics, rankings, metrics, and derived insights generated by SciSports from submitted content, which constitute SciSports' own intellectual property; or
- Content that SciSports is required to retain under applicable law or legitimate legal

proceedings.

How to submit a request: Minor users, or their parents or legal guardians, may submit a content removal request by emailing legal@scisports.com with the subject line "Minor Content Removal Request." The request should include:

- The minor's full name and account email address;
- A description of the specific content to be removed; and
- Confirmation of the relationship to the account (player, parent, or legal guardian).

Verification: SciSports will verify the identity of the requestor and their relationship to the account before acting on any request. For requests submitted by a parent or legal guardian, reasonable proof of that relationship may be requested.

Response timeframe: SciSports will action verified removal requests within 30 days of verification. Where removal is not technically possible in all systems within that timeframe, SciSports will render the content invisible to all platform users within 30 days and complete full deletion as soon as technically practicable.

Limitations: SciSports cannot guarantee removal of content that the minor user has themselves shared outside the platform. Where a minor has chosen to share their own content externally — including via social media or third-party platforms — SciSports has no ability to action removal from those external locations and bears no responsibility for such content.

(k) Canadian Minor Users. For minor users located in Canada, SciSports processes personal data in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy legislation. Organizations operating in Canada are required under their agreements with SciSports to have obtained all necessary parental or guardian consents required under Canadian federal and provincial law prior to submitting minor player data to SciSports.

7. Rights of U.S. Residents

Residents of states with comprehensive privacy laws, including California, Virginia, Colorado, Connecticut, Utah, Oregon, Delaware, Iowa, Nebraska, New Hampshire, New Jersey, Tennessee, Minnesota, and Maryland, may have certain rights regarding their personal information. These rights may include the right to access personal data, request correction of inaccuracies, obtain deletion of personal data, receive a copy of personal data in a portable format, opt out of the sale or sharing of personal data, and restrict the processing of sensitive data where permitted by law. For California residents, this includes all rights enumerated under the California Consumer Privacy Act and the California Privacy Rights Act, including the rights of access, deletion, correction, and portability, as well as the right to know categories of personal information collected, sources of such information, purposes of use, and categories of third parties to whom personal information is disclosed.

Residents of Delaware, Oregon, and other states listed herein may exercise their rights through a clear and conspicuous link or request form designated for that purpose. We will provide the same level of functionality and access regardless of a consumer's exercise of these rights. We do not sell personal information or use children's data for targeted advertising. Requests to exercise these rights may be submitted via legal@scisports.com. We will verify the identity of each requester using reasonable procedures and respond within the period required by applicable law. If we deny or partially deny a request, users may appeal by following the procedures described in Section 9 of this

Policy.

8. Verification and Authorized Agents

Where authorized by law, an individual may designate an authorized agent to submit a privacy request on their behalf. The agent must provide written authorization and sufficient proof of identity. We may deny requests that cannot be verified as authentic.

9. Non-Discrimination and Appeals

We will not discriminate against any person for exercising privacy rights under this Policy or applicable law. We will not deny goods or services, charge different prices, or provide a different level of quality to any consumer who exercises rights under this Policy or applicable state privacy laws. Individuals who believe their privacy request was wrongfully denied may appeal the decision by contacting legal@scisports.com with "Appeal Request" in the subject line. For users located in Tennessee, Minnesota, Maryland, or other states that establish formal appeal mechanisms, all appeal determinations will be documented and retained for at least twenty-four months as required by law.

10. Cookies and Analytics Technologies

The Services use cookies and comparable tracking technologies to enhance user experience, analyze performance, and tailor content. Most web browsers permit you to control or disable cookies through settings; however, certain features of the Services may not function properly without them. Users in California and Delaware may limit or disable cookies used for advertising or analytics through their browser settings or by submitting an opt-out request under applicable law.

11. Data Transfers and Cross-Border Considerations

All data collected from U.S. users is processed and stored in the United States. We maintain written data processing agreements with all third-party service providers and processors that handle personal information on our behalf. These agreements specify the nature and purpose of processing, data security requirements, and obligations for deletion or return of personal information at termination of services. To the extent personal information is transferred internationally, we ensure such transfers occur pursuant to appropriate legal mechanisms, including the use of data processing agreements and, where applicable, Standard Contractual Clauses (SCCs) approved by the European Commission. We require all third-party processors to provide equivalent data protection safeguards and to process personal information only under our instructions.

12. Updates to the Privacy Policy

We may amend this Policy from time to time to reflect changes in our practices or legal requirements. When material changes are made, we will post a notice of update in a prominent and readily accessible location on our website and will indicate the effective date of the revised Policy, consistent



with requirements under the California and Delaware statutes.

13. Contact Information

Questions or concerns about this Policy, or requests to exercise applicable privacy rights, may be directed to:

SciSports Inc. 270 Upland Square Drive #1104, Pottstown, PA 19464, United States
legal@scisports.com

14. Interpretation and Conflicts

This Policy is intended to comply with applicable U.S. federal and state privacy laws. It is intended to satisfy disclosure and notice requirements under the privacy laws of California, Virginia, Colorado, Connecticut, Utah, Oregon, Delaware, Iowa, Nebraska, New Hampshire, New Jersey, Tennessee, Minnesota, and Maryland. If any provision conflicts with a legal requirement in a particular jurisdiction, the provision affording greater protection to users' personal information shall control to the extent required by law.