



LINKSPORTS INTERNATIONAL CORP.

## Privacy Policy

Privacy policy regarding the processing of personal data

**Last updated: September 01, 2023**

### Introduction

LinkSports **International Corp.**, with registered office at 4936, Yonge Street, Suite 327, North York, Ontario ON, Canada, ZIP Code M2N 6S3, registered under No. 1218934-8 before the Canadian corporate register, (referred to as "**LINKSPORTS**", "**We**", "**Us**" or "**Our**" in these Terms and Conditions) is a **worldwide technology company that allows fans to support football players through an online platform (the "LINKSPORTS Platform")** dedicated to fans, players in training, amateurs, professional athletes and former athletes, to sports professionals engaged in the development of athletes, scouts, clubs and all those who love Football and aspire to the democratization of access to opportunities and the beneficial potentialities arising from the social practice of sport, up to the possibility of professional advancement.

LinkSports respects your privacy, and we want you to understand how we may collect personal information about you through our websites and Platform: <https://www.linksports.com/legal/privacypolicy.pdf> (each a "Site" and collectively, "Sites"), and how this information may be used, maintained and, in some cases, shared. This privacy policy ("Privacy Policy") sets out the privacy practices and policies that govern our Sites and describes in detail how we process the personal data of users of the LINKSPORTS Platform and the rights they have in relation to such processing.

The processing of personal data must be carried out in accordance with the PIPEDA fair information principles, relating to the protection of natural persons with regard to the processing of personal data and the free movement of such data and absorbs in what is most restrictive what determines the General Data Protection Law, Law 13.709/2018 ("LGPD"), as well as any other applicable legal provisions regarding the protection of personal data.

LINKSPORTS is the controller of the personal data it collects from and about users through the LINKSPORTS Platform and/or for any other interactions we may have with you, such as those related to the provision of Our services or during marketing activities.

This Privacy Policy applies to all users, regardless of whether they are unregistered users, Registered User, may adopt one of the *profiles* ("Fan"), ("Player"), ("Parent or Legal Guardian"), ("Scouts") and ("Coaches"), individuals and representatives of legal entities ("**Users**"). In addition, to the extent that the User represents a legal entity that will act through the LINKSPORTS Platform, LINKSPORTS will process the personal data of the persons acting on their behalf.

"**Personal Information**" is any information that allows us to identify you, directly or indirectly, by reference to an identifier, such as your name, identification number, location data, online identifier, or one or more factors specific to you. Personal information includes "sensitive personal information" and "pseudonymised personal information," but excludes anonymous information or information that has had an individual's identity permanently removed.

BY USING OR ACCESSING OUR WEBSITES OR PROVIDING PERSONAL INFORMATION TO US ON OR THROUGH SUCH WEBSITES, **YOU CONSENT TO THE COLLECTION, USE, TRANSFER AND DISCLOSURE OF SUCH INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND APPLICABLE LAW.**

Read our Privacy Policy to understand:

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### **Information We Collect and How We Use It**

The following describes the types of personal and other information we may collect about you and how we use and maintain that information:

### **Information You Provide To Us**

LINKSPORTS collects and retains personal information about you, including name, email address, physical address, phone number, or other personal or background information when you voluntarily submit it to us. If you submit information related to an *event* or *championship* listed in <https://linksports.com/>, in addition to contact information we may collect your *date of birth, sporting history, height, weight, age, as well as information about references that you identify.*

Before using some parts of our websites, we may require you to request access to those parts by providing us with your contact information, a username and password. If you provide us with a phone number or an email

address, you expressly agree that we, or our authorized agents, may use this information to contact you about your access request or your account, or about LINKSPORTS and its associated activities.

LINKSPORTS collects information reported by individuals and entities as part of its regulatory activities, which may include personal information, names, addresses, email addresses, telephone numbers. If you submit other people's personal information to LINKSPORTS, you represent and warrant that you have the necessary consent or authority to do so.

We may retain any information you provide to us indefinitely.

### **Social Networking Activities**

Our websites may allow you to log in to social networking sites such as Facebook, YouTube, Instagram, TikTok and X (formerly Twitter). If you choose to follow, type, friend, share or comment on our social media sites, or share information on these social networking sites, we may receive information about you. We may use this information about you in a variety of ways, including to improve your experience with LINKSPORTS outreach and to communicate with you about new LINKSPORTS activities.

We may keep all of this information indefinitely.

### **Financial Transactions**

If you make purchases or subscriptions to a premium plan, you will be involved in a financial transaction through our Site, <https://www.linksports.com>. In any transaction, you will be asked to provide certain financial information in order to effect a bank transfer. We do not retain your account and routing numbers. We may transfer it to third parties for payment processing. We use technology designed to encrypt the transmission of data to us through the system, as well as financial information that we receive, transfer or maintain. If you submit financial information through Linksports, all such data is sent directly and securely to a third-party payment processor; LINKSPORTS does not retain any financial information submitted.

### **Site Usage Information**

LINKSPORTS may collect technical information relating to each time a visitor arrives at our websites, including the IP address of visitors to our Websites. This information is considered personal information under this Privacy Policy. We may also collect information about your use of our Sites, including number of visits, average time spent on the Sites, pages viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to navigate away from the page, and any phone number used to call us. Gathering this information helps us improve the content we offer. You do not need to register on our websites before we can collect this information. We may share with third parties this information or other data on an aggregate basis without the use of any information that personally identifies you.

### **How We Use Information**

We use your personal information in accordance with the terms of the Privacy Policy in effect at the time of our use. We will only process your personal information, including by sharing it with third parties, where (1) you have provided your consent that can be withdrawn at any time, (2) the processing is necessary for the performance of a contract to which you are a party (including your registration or agreements with us), (3) we are required by law, (4) the processing is necessary to protect your vital interests or those of another person, or (5) the processing is necessary for the purposes of our legitimate business or regulatory interests, provided that your interests and fundamental rights do not override those interests.

- a. We use the personal information that you give us, that we collect through social media activities, and that we receive through financial transactions on SAPS:
  - i. to fulfill our obligations arising from your registration and any other agreement entered into between you and us;
  - ii. to identify you and communicate with you;
  - iii. to update and communicate with you about your account as needed;
  - iv. to provide you with the information and services you request from us;

- v. conduct our regulatory activities and conduct research and analysis;
  - vi. to respond to your inquiries and provide related services;
  - vii. improve LINKSPORTS websites;
  - viii. to improve your experience with the dissemination of LINKSPORTS;
  - ix. to communicate with you about new or existing LINKSPORTS activities and other information that LINKSPORTS believes is relevant and useful to its visitors, where you have not opted out of receiving such information;
  - x. to send you information from third parties that LINKSPORTS believes to be relevant and useful to you, where you have given your consent;
  - xi. to notify you of changes to our activities or related services or to ask you to provide feedback;
  - xii. to allow you to attend a conference, seminar or complete a survey;
  - xiii. to administer and protect our business and websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data hosting); or
  - xiv. to process and consider you for employment at LINKSPORTS.
- b. We use the aggregated and anonymous website usage data collected to perform statistical analyses of the collective characteristics and behaviour of visitors to the Sites; measure your interests in relation to specific areas of the Sites; and analyze how and where best to use our resources. Without this data, we would not know which parts of the Sites are the most popular, and we would not be able to properly change and update the content and services.

## **Processing of personal data**

### **1. Types of data collected**

When using Our Services, we will collect the following types of personal data:

- Identification data: name, surname, country of residence, data included in your identification documents (passport/national identification number, citizenship)
- Contact information: email address
- Bank information: IBAN number, credit/debit card details
- Signature and photography
- Any information that may represent personal data included in interactions with the LINKSPORTS Platform
- Usage data:
  - When accessing the web version of the LINKSPORTS Platform: the Internet Protocol address of the device (e.g. IP address), browser type, browser version, pages accessed from the LINKSPORTS Platform, the time and date of the visit on the LINKSPORTS Platform, the time spent on these pages, unique device identifiers and other diagnostic data.
  - When accessing the LINKSPORTS Platform through a mobile device: the type of mobile device, unique ID of the mobile device, the IP address of the mobile device, mobile operating system, the type of mobile Internet browser used, unique device identifiers and other diagnostic data.
  - Data relating to the interaction of Users with the LINKSPORTS Platform: likes, comments, information contained in the user's profile.

We will collect personal data directly from Users (in the case of identification data, contact information or banking information) or automatically by technical means (in the case of usage data).

## 2. Purposes and legal basis for the processing of personal data

### 1. Name and e-mail address

Purpose: To manage your registration as a Registered User and provide access to the features of the Service (account creation)

Legal Basis: Performance of a contract entered into with you in relation to the provision of our Services (in accordance with the Terms and Conditions),

### 2. Data included in the User's profile, interactions with the LINKSPORTS Platform and information about them

Purpose: To provide the functionalities of the LINKSPORTS Platform to Registered Users

Legal Basis: Performance of a contract entered into with you relating to the provision of our Services (in accordance with the Terms and Conditions) in accordance with Article 6 paragraph (1) lit.

### 3. Name, surname, country of residence, bank details

Purposes:

- Provision of Services;
- Sale of Products;
- Identification of payments made by Users for validation purposes;
- Administration of our Services;
- Delivery of content, campaigns and interaction of the LINKSPORTS Platform with Users

Legal basis: Performance of a contract entered into with you in relation to the provision of our Services (in accordance with the Terms and Conditions).

### 4. Data included in identification documents, including the photograph

Purpose:

- Verify the identification of Users and aggregate services to the User

Legal basis:

- LINKSPORTS' legitimate interest in ensuring the security of its relationships with users and offering the full experience of the Service.

### 5. Contact Information

Purposes:

- Manage the relationship with Users, including the management of requests, authorizations to use sensitive data and complaints from Users and responding to them.
- Contact Users by email or other equivalent forms of electronic communication, such as push notifications from a mobile application about updates or informational communications related to the functionalities, products or services contracted, including security updates, when necessary or reasonable for their implementation.
- Provide users with news, special offers and general information about other goods, services and events we offer that are similar to those they have already purchased or consulted, only when Users have opted in to receive such information

Legal basis:

- Conclusion and execution of a contract relating to the provision of our Services.
- Legitimate interest of LINKSPORTS in improving or modifying the services offered and in managing its business.

### 6. Usage data

Purposes:

- Delivery of content, campaigns and interaction of the LINKSPORTS Platform with Users

Legal basis:

- Performance of a contract entered into with you in relation to the provision of our Services.

## **Sharing of personal data**

### **1. Recipients of personal data**

We will share your personal data with a limited number of third parties in the following situations:

- Service providers: payment processors, marketing providers, IT service providers, electronic signature providers, e-mailing service providers, other professional service providers (accountants, lawyers, consultants, auditors, professional consultants, etc.).
- We will share your personal data with Service Providers to monitor and analyze the use of our Service; display ads; help support and maintain our Service; contact Users; to effectively manage our business and comply with regulatory requirements.
- Tax, governmental, judicial and supervisory authorities
- We will share your personal data to respond to requests from authorities and comply with our legal obligations.

LINKSPORTS will ensure in advance that third parties enjoy confidence in the guarantee of the protection of personal data and, where applicable, that the providers act on the basis of the express instructions of the Controller addressed through the agreements for the processing of personal data.

### **2. Transfers of personal data to third countries**

Depending on the service providers used to enable the operation or functionalities of the LINKSPORTS Platform, your personal data will be transferred to other countries not necessarily Canada – more specifically, the United States of America and Japan. The transfer of your personal data to a third country is carried out in accordance with the implementation of legally adequate safeguards for the protection of your personal data.

### **Retention periods**

The Company will retain the personal and other data provided by the User, while keeping active the registration of Registered User only for the necessary time, committing to the respective anonymization as determined and legal deadlines.

The personal data processed on the basis of the contractual relations that the Users have with LINKSPORTS will be stored throughout the contractual period, as well as for a subsequent period of 3 years, counted from the end of the contractual relationship, unless longer storage periods are required by mandatory legal provisions. We will keep your data for a period longer than 3 years in the event of a complaint or if we have reason to believe that there is a risk of a dispute in the relationship with you.

The financial data will be processed for a period of 10 years, as provided for in the legislation in force.

After the end of such retention periods, we delete or anonymize your personal data.

### **Rights of the user in relation to the processing of their personal data**

LINKSPORTS undertakes to respect the confidentiality of your personal data and to ensure that you can exercise your rights.

In accordance with the provisions of the LGPD and PIPEDA, you have the following rights:

- The right of access to personal data: you can obtain a confirmation that your personal data is processed by us, information about this personal data, as well as a copy of the personal data we hold about you.
- The right to rectify personal data: you can ask us to correct the incomplete or inaccurate personal data we hold about you
- The right to restrict the processing of personal data – in situations expressly regulated by law (for example, if the accuracy of the personal data relating to the User is contested, for the period necessary to verify its accuracy, etc.) the User may obtain the restriction of the processing of personal data by the Controller. The restriction of processing means that the Controller will limit itself to the storage of personal data and will not

carry out other processing operations, except with the consent of the user or in other cases expressly revised by law (mainly for the establishment, exercise or defense of a right in court or for the protection of the rights of another natural or legal person).

- The right to delete personal data ("the right to be forgotten") – in situations expressly regulated by law (for example, in case of revocation of consent, if there is no other legal basis for the processing of data or if it is found that the personal data are no longer necessary for the purpose for which they were collected or processed, etc.), you can get this data deleted.
- The right to object to the processing of personal data – the User may object at any time, for reasons related to his particular situation, to the processing by the Controller of personal data in certain cases expressly provided for by law (in particular, if the processing is based on the legitimate interest of the Controller). In addition, where the processing of personal data is for direct marketing purposes, the data subject has the right to object at any time to the processing for that purpose of personal data concerning him/her, including profiling.
- The right to the portability of personal data – in situations expressly regulated by law (respectively, if the processing of personal data is carried out by the controller by automatic means and has as its legal basis the execution of a contract or consent), the User may receive, in a structured and machine-readable format, the personal data that have been provided to the Operator and may request that such data be transmitted to another operator.
- The right to withdraw the consent given – The User may withdraw at any time his consent to the processing of personal data by the Controller. The withdrawal of consent will only take effect for the future, with the processing carried out prior to the withdrawal still remaining valid.
- Additional rights related to automated individual decision-making – LINKSPORTS does not make automatic decisions as a result of the processing of personal data relating to Users.

Users may exercise their aforementioned rights at any time by sending a written request (together with their contact details) and sending it in electronic format by mail in [info@linksports.com](mailto:info@linksports.com). Such exercise is free of charge unless your request is clearly unfounded, repetitive or excessive, in which case we may charge a reasonable fee or we may refuse to act on the request.

### **Opting out of communications**

If you have subscribed to or are receiving LINKSPORTS news or similar information from us by email and no longer wish to receive such information in the future, you may opt out of receiving such emails by clicking on the "unsubscribe" link at the bottom of the emails you receive or on the unsubscribe page on the Sites. Please allow us sufficient time to process your request. If you are having difficulty unsubscribing, please contact us directly at [info@linksports.com](mailto:info@linksports.com).

Please note that even if you opt out of receiving emails, you may still receive communications related to LINKSPORTS' supervisory activities or otherwise as required by law. Please also note that we may need to retain the information we collect about you for registration, research, and other purposes.

### **Disclosure of information to third parties**

We will not share, rent, sell, or disclose any personal information we collect about you through our Sites, except in any of the following situations or as described in this Privacy Policy:

- You request or authorize the release of your personal information.
- We may disclose personal information to our contracted third parties and payment processors who perform services for us in connection with the Sites, or to complete or confirm a transaction or series of transactions you conduct with us. We may also disclose personal information to service providers or vendors if the disclosure allows that party to perform business, professional, or technical support for us.
- We may disclose personal information as part of a transfer of LINKSPORTS' related assets or interests. We do not warrant that any entity receiving such information in connection with one of these transactions will comply with all of the terms of this Privacy Policy.
- We may disclose personal information to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, or to enforce our Terms of Use or other

agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others. We reserve the right to disclose information we collect to law enforcement or other government officials as we, in our sole and absolute discretion, deem necessary or appropriate.

- We may also share aggregated or anonymous information that cannot identify you with third parties. For example, we may disclose the number of visitors to our websites or the number of people who have downloaded a specific document.

## **Safety**

We use technology designed to encrypt the transmission of data to us through our websites. In addition, we take steps to protect all user data we collect from any unauthorized access. However, you should keep in mind that the Sites run on software, hardware and networks, any component that may, from time to time, require maintenance or experience issues or security breaches beyond our control.

While we take steps to protect your personal information and keep it secure, you also play a role in protecting your information. You must maintain the security of your online transactions by not sharing your passwords and account information with any unauthorized parties.

Please also be aware that despite our best intentions and the guidelines outlined in this Privacy Policy, no data transmission over the Internet or encryption method can be guaranteed to be 100% secure. LINKSPORTS cannot guarantee the security of any information you transmit to us or our Sites and therefore you use our Sites at your own risk.

## **Links to other websites**

Our websites may contain links to other websites, including social media sites hosted by third-party providers; however, this Privacy Policy only addresses LINKSPORTS' use and disclosure of your information collected through our Sites, if any. If you choose to link to an external website from our website, you will leave our Website. We are not responsible for the privacy practices of third parties or the content of linked sites. We encourage you to read the applicable privacy policies and terms and conditions of such parties or websites.

## **Children's Privacy**

If you are under the age of 16, it will be necessary, for your registration, as well as the maintenance of any of your data, the consent and authorization of your legal representative, to access the full functionality of our Sites. It is not our intention to collect or use personal information from anyone under the age of 16, and we will only do so with consent and within the law. If we become aware that we have collected any personal information from children under the age of 16 and are asked to delete that information from our system, we will do so promptly.

## **Consent to transfer information from outside to Canada**

If you access the Sites from outside of Canada, the information we collect about you will be transferred to servers within Canada and kept indefinitely, which may involve transferring information outside of your home country. By allowing us to collect information about you, you consent to this transfer and processing of your data.

We will not collect your personal information through the Sites unless you have voluntarily provided it or the collection is in accordance with LINKSPORTS' regulatory activities or is consistent with this Privacy Policy. In situations other than those listed in this Privacy Policy, you will be informed whether your personal information will be disclosed to third parties and you will have the opportunity to opt out of such disclosure unless such disclosure to third parties is in accordance with LINKSPORTS' regulatory activities or is required by law.

## **Government Act**

By choosing to visit our websites or provide information to us, you agree that any dispute about privacy or the terms contained in this Privacy Policy will be governed by Canadian law. You also agree to abide by any limitation of damages contained in our Terms of Use or other agreement we have with you.



## **Changes to this Privacy Policy**

We may occasionally change this Privacy Policy to reflect LINKSPORTS' activities and user feedback and we reserve the right to make changes to this Privacy Policy at any time. If at any time we decide to use personal information in a manner materially different from that stated at the time it was collected, we will endeavor to notify you of such changes before implementing them by posting a revised Privacy Policy with a new "Last Updated" date, displaying the word "updated" next to the Privacy Policy link on each page of the Sites, or otherwise. The use of your information is subject to the Privacy Policy and Terms of Use in effect at the time of use. The provisions contained in this Privacy Policy supersede all prior notices or policies about our privacy practices with respect to our Sites. Please check the "Last updated" caption at the top of this page to see when this Privacy Policy was last revised. We encourage you to check back frequently to see the current Privacy Policy to be informed of how LINKSPORTS is committed to protecting your information and providing you with improved content on our websites in order to improve your experience.

## **Interpretation and definitions**

All terms and concepts herein included in capital letters and not defined elsewhere shall have the same meaning as provided in the LINKSPORTS **Terms of Use and Conditions**.

Defined terms will have the same meaning, regardless of whether they appear in the singular or plural.

## **Contact**

If you have any questions or complaints about our Privacy Policy or our Sites, please contact us [info@linksports.com](mailto:info@linksports.com) or send a letter to:

**LinkSports Internacional Corp.327-4936 Yonge Street  
Toronto, Canada MSN 6S3  
Attention: General Counsel**