

PRIVACY POLICY

Effective July 20, 2022

SportsX, LLC (hereinafter collectively referred to as “**STX**,” “we,” “us,” or “our”) has prepared this Privacy Policy to explain how we collect, use, disclose, transfer, store, retain or otherwise process your information when you access and use our website located at <https://stxapp.io/> (the “**Site**”), our mobile applications (“**Applications**”), and our sports betting platform and related services available through the Site and the Applications (the “**Services**”).

STX is operating the Services and providing gaming offerings as part of the open and regulated internet gaming (iGaming) market in Ontario conducted and managed by iGaming Ontario (“iGO”) and is collecting, using, and disclosing Personal Information on behalf of, and as agent to, iGO.

We are providing the Services including: (1) collecting, using, and disclosing Personal Information on behalf of and as agent to iGO; and (2) collecting Personal Information in accordance with The Freedom of Information and Protection of Privacy Act (“FIPPA”), Personal Information Protection and Electronic Documents Act (“PIPEDA”) and other applicable laws, and under the authority of Ontario Regulation 722/21 made under the Alcohol and Gaming Commission, and the operating agreement entered into with iGO.

By continuing to interact with the Services, you confirm that you have read this Privacy Policy and the Terms of Use and are expressly consenting to the collection and use of your information (including personally identifiable information) by us as identified herein, in compliance with this Policy and Terms of Use for the Services. If you do not want us to collect, use, or share your information in the ways described in this Policy, please do not use the Services.

In this Privacy Policy, “**Personal Information**” means information about an identified or identifiable individual and includes any information that constitutes personal information within the meaning of FIPPA and other applicable privacy laws.

STX reserves the right, at any time, to modify this Privacy Policy. If we make revisions that change the way we collect, use, or share Personal Information, we will post those changes in this Privacy Policy on our website. You should review this Policy periodically so that you keep up to date on our most current policies and practices. We will note the date of the latest version of our Privacy Policy at the beginning of this Privacy Policy.

If you have any questions regarding how we collect information, please contact us under [How to Contact STX](#) section below.

Types of Information We Collect.

We collect and use the following information to provide, improve, protect, and promote the Services:

- **Account Information.** We collect, and associate with your account the Personal Information you provide to us when you do things such as register for an account. Such information may identify you personally, which include but are not limited to: your full name, alias/preferred name, country of residence, e-mail address, mailing address, telephone numbers,

identification documentation, date of birth, descriptive occupation, billing information, credit card or bank account information and your preferences.

Additionally, if you attest to being a Politically Exposed Person (“PEP”), the Head of an International Organization (“HIO”), or a family member or a close associate of a PEP or HIO, as defined in the Terms of Use, you will be required to provide additional information such as your source of funds, your source of wealth, the nature of your connection to the PEP or HIO if you are a family member or a close associate of a PEP or HIO, the nature of the relationship, as applicable. This information is collected on behalf of iGO and may be shared with other Operators as part of enterprise level player monitoring.

- **Funding Information.** When funding your account, we will utilize third party services to collect payment information including, but not limited to: debit/credit card numbers, bank account numbers, and routing numbers. We do not retain this financial information as it is processed by our third-party partners and is subject to the terms and privacy policies of each of the partners. You should review the privacy policy of these partners and can ask questions with regard to their policy on their website.
- **Location Information.** We are required to establish your physical location when using our Services to ensure you are within Ontario. To establish your location, we will utilize third party services that may collect data including your Internet Protocol (“IP”) Address, device type, Internet Service Provider, and other location related tracking data.
- **Survey Information.** When you participate in one of our surveys, we may collect additional information about your profile, activity, usage, and preferences related to the Site and the Services, so that we can evaluate your interest in and the quality of our products, Services, and customer and technical support.
- **Device Information.** We may collect information about the devices you use to access the Services, including the hardware models, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information. If you have downloaded our mobile Applications, we may also collect certain information from your mobile device, including information about how you use the Applications. This information is generally used to help us deliver relevant information to you. In the event our Applications crash on your mobile device, we will also receive information about your mobile device model, software version and device carrier, which allows us to identify and fix bugs, provide other technical support, and improve and optimize the performance of our Applications.

How We Collect Information

We may collect Personal Information from you in the following ways:

- **By asking you directly.** We may collect some Personal Information from you by asking that you provide it to us. We may collect account information through various forms and in various places on the Site, including if you create an account or when you otherwise interact with the Services. It is your choice to provide this information however some information may be mandatory in order for you to use the Services.
- **Cookies.** Like many online services, we use “cookies” to collect technical information. Cookies are small pieces of information that a website sends to your computer's hard drive while you

are viewing the website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Site, Applications, and the Services.

We may use cookies to collect information about your IP address, browser type, operating system, device type and identifiers, platform type, as well as your usage of and activity on our Website and Applications and the performance of our Services. These types of information are collected to make the Site, Applications and the Services more useful to you and to tailor your online experience to meet your special interests and expectations. If you choose, you can set your browser to reject cookies or you can manually delete individual or all of the cookies on your computer by following your browser's help file directions. Please note however, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using some of the pages and features that are currently on the Site, or that we may put on the Site in the future.

- **Tracking Technologies.** In order to improve, personalize, and optimize our Services and meet our legal obligations, we may automatically track certain information about your visits to and usage of the Site, Applications, and the Services, including your browser type, operating system, IP address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), device identifier, domain name, clickstream data, referring/exist pages, geolocation, and a date/time stamp for your visit. We also use this information to analyze trends, administer the Site, gather demographic information about our user base, deliver advertising, perform research, provide technical and customer support, improve our product development efforts, protect our legal rights, address disputes, and prevent our Services from being used to commit harmful or unlawful activities, including fraud. Some of this information may also be collected so that when you use the Site, Applications, or the Services again, we will be able to recognize you and optimize your experience accordingly.
- **Pixel Tags.** In addition, we use "pixel tags" (also referred to as clear gifs, web beacons, or web bugs). Pixel tags are tiny graphic images with a unique identifier, similar in function to cookies, that are used to track online movements of web users. In contrast to cookies, which are stored on a computer's hard drive or web browser, pixel tags are embedded invisibly in web pages. Pixel tags are often used in combination with cookies, trigger the placing of cookies, and transmit information to us or our service providers. This enables two websites to share information. The resulting connection can include information such as a device's IP address, the time a person viewed the pixel, an identifier associated with the browser or device, the type of browser being used and the URL of the web page from which the pixel was viewed. Pixel tags also allow us to send email messages in a format that users can read, tell us whether emails have been opened, and help to ensure we are sending only messages that may be of interest to our users. We may also use this information to reduce or eliminate messages sent to a user.
- **Web Beacons.** A web beacon is an electronic file on a web page that allows us to count and recognize users who have visited that page. Among other things, a web beacon can be used in HTML-formatted email to determine responses to our communications and measure their effectiveness. For instance, if you get an email from us and click on a link in that email to go to the Site. You can generally avoid web beacons in email by turning off HTML display and displaying only the text portion of your email.

- **Web Server Logs.** Web server logs are records of activity created by the computer that delivers the webpages you request to your browser. For example, a web server log may record the search term you entered or the link you clicked to bring you to the webpage. The web server log also may record information about your browser, such as your IP address and the cookies set on your web browser by the server.
- **Enhanced Information.** We also may enhance the Personal Information we collect from users with other information from third party Data Sources, as defined below.
- **Third Party Data Sources.** In addition to the information that we collect from you directly, we may receive information about you from third parties, such as our vendors, business partners, our affiliates, data providers, data partners or publicly available sources (“**Data Sources**”). We allow Data Sources to send us marketing information that they have collected from both online and offline sources. This may include information from customer lists, website memberships, or other information created from a third-party’s own technology (such as proprietary modeling or matching technology of other companies).

Why We Collect Information

We collect and use Personal Information for various purposes, including:

- Setting up your Account, verifying your identity, and providing you with the Services.
- Completing or processing transactions for you and sending you confirmations and receipts.
- Verifying whether you are eligible/permitted to use the Services.
- Complying with our legal or regulatory obligations, protecting our legal rights, and addressing existing or anticipated disputes.
- Recognizing or identifying you when you return to the Site.
- Evaluating your interest in and the quality of our products, Services, and customer and technical support.
- Informing you about updates to your account and the Services.
- Answering questions and responding to your customer service requests.
- Monitoring the usage and performance of the Site and the Services and determining aggregate information and usage patterns.
- Making the Site and the Services easier to use, helping diagnose problems with the Site or the Services, or enhancing the Site and the Services for optimal user experience.
- Helping us deliver relevant information to you.
- Identifying and fixing bugs, providing other technical support, and improving and optimizing the performance of the Site, Applications, and the Services.
- We may use your Personal Information to advertise and market the Services (and those of our partners) to you, for example, to present targeted advertisements on the Site and other third-party websites, in email marketing, and in direct mail marketing.
- We also use your Personal Information to analyze the effectiveness of our advertisements, and to determine whether you would be interested in new features or services we may offer.

You may opt out from receiving marketing emails from us by clicking the unsubscribe link in any emails sent to you or from your account settings. This will not affect your account and you will continue to receive transactional emails such as account deposits and withdrawals.

How we Share Information

We may share Personal Information for the purposes described below, and for any other purposes identified to individuals before or at the time their Personal Information is collected. In each case, the legal basis that we would rely on for processing your Personal Information is set out below.

- **Parties You Share With.** When you use the Site, Applications, or the Services, the Personal Information you openly provide with others will be shared with parties you allow to receive such information. For example, you may elect to communicate Personal Information with other users who are participating in the same Game as you.
- **Internally Within STX.** Your Personal Information may be accessed by or disclosed to employees of STX who have a need to know such information. Such employees may include members of our sales, marketing, customer support, compliance, engineering, information technology, and human resources teams, depending upon the information they each require in order to perform their job duties and responsibilities.
- **Service Providers.** We may share your Personal Information with certain service providers to: provide you the Services we offer through the Site and Applications; conduct quality assurance testing; facilitate the creation of accounts; provide account authentication and user verification services; provide technical and customer support; geolocate users; personalize, customize, and improve your use and experience of the Services; process payments to you and other financial transactions; send email and push notifications; enable security support and technical maintenance; send you newsletters, surveys, messages, and promotional materials related to the Services or on behalf of other companies; verify your identity; prevent harmful or unlawful uses of our Services, including fraud; deliver you customized or personalized content, information, and advertising; understand when users have installed our Applications; monitor the health and performance of code on users' devices; request user feedback; send users links to download our Applications; monitor the health of our servers; manage search engine optimization; and improve and optimize the performance of the Services.

Currently, the service providers engaged by STX who may have access to or handle the Personal Information that we collect or otherwise process are:

- Amazon Web Services
- Paysafe
- Aristotle
- GeoComply

Please note that we may change or add third party service providers at any time, in our sole discretion, either locally or abroad. You should review the privacy policies of any websites that you submit your personal information to, and we encourage you to regularly review this Privacy Policy to obtain updated information about our service providers.

- **Threat Detection.** We use certain service providers to provide threat detection, user authentication, and fraud prevention services. These service providers may automatically collect certain information about your visits to the Site and Applications, as well as the device you use to connect to the Services, in order to monitor for potential threats or bad actors. This information may include, among other things, your IP address and your device's unique identifiers. You should review the Privacy Policies of these operators as they are separate from ours.

- **Advertising.** We may use certain vendors to serve ads on the Site and Applications. In connection with the delivery of advertising, certain vendors may automatically collect information about your visits to this and other websites, including your IP address, internet service provider, unique personal identifiers, and the browser you use to visit the Site. They do this by using cookies, beacons, pixel tags, clear gifs, or other technologies. The information collected may be used, among other reasons, to deliver advertising targeted to your interests and to better understand your usage of, preferences on, and visitation of the Site, Applications, and the Services and other sites tracked by these vendors. This Privacy Policy does not apply to, and we are not responsible for, cookies, pixel tags and like technologies used in connection with other parties' ads, and we encourage you to check the privacy policies of advertisers and ad services to learn about their use of such technologies. If you would like more information about these practices to understand your options for not having your information collected and used by such companies, please click here: <http://www.aboutads.info/choices> or <https://www.networkadvertising.org/>.
- **Analytics.** We use a number of service providers, such as Google Analytics, to help analyze how people use the Services ("**Analytics Companies**"). Analytics Companies use cookies and similar technologies to collect information pertaining to how people use our website and Applications, what pages they visit, and what other sites they may have used prior to using our Services. We use the information we get from Analytics Companies to improve and optimize the Site, Applications, and the Services.
- **Permitted by Law.** We may share your information with others as required by, or permitted by, law. This may include sharing your information with governmental entities, or third parties in response to subpoenas, court orders, other legal process, or as we believe is necessary to exercise our legal rights, to defend against legal claims that have been brought against us, or to defend against possible legal claims that we determine in our sole discretion might be brought against us.
- **Corporate Transaction.** Personal Information may be disclosed or transferred as part of, or during negotiations of any purchase, sale, lease, merger, amalgamation, or any other type of acquisition, disposal, securitization, or financing involving STX.
- **Aggregated, Anonymized or De-identified Data.** We may also share aggregated, anonymized, or de-identified information, which cannot reasonably be used to identify you.
- **Affiliates.** We may share your Personal Information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control).

How We Secure Personal Information

The security of your information is important to us. We use reasonable administrative, technical, and physical procedures, practices, and safeguards designed to protect Personal Information we collect from unauthorized access, use, alteration, exfiltration, or destruction. Additionally, we will keep your information for only as long as it is needed to achieve its purpose or meet our legal obligations. We make concerted, good faith efforts to maintain the security of your information. Although we work hard to ensure the integrity and security of our systems, it must be recognized that no information system is 100% secure and, therefore, we cannot guarantee the security of such information.

As stated in this notice, we give our customers a mechanism to opt out of having their Personal Information disclosed to third parties for their direct marketing purposes. If you wish to opt-out of sharing your Personal Information with third parties for their direct marketing purposes, please email us at contactus@stxapp.io and describe your request as “Re: Opt-out” or use the unsubscribe link on our website.

Your information may be stored and processed in any country where we or our affiliates have facilities or in which we engage service providers and, by using the Site, Applications, or Services, you consent to the transfer of information to countries outside of Canada.

Privacy of Children. Individuals who are not of the legal gambling age of 19 are not eligible to use the Services. Accordingly, we do not knowingly collect Personal Information from children or individuals under the legal gambling age. If you are under the legal gambling age in your jurisdiction, please do not submit any Personal Information through the Site, Application or Services. If we discover that we have collected such information, we will promptly delete it, subject to any legal and contractual restrictions. If you have reason to believe that we may have accidentally received personal information from a child or an individual under the legal gambling age in their jurisdiction, please contact us immediately at contactus@stxapp.io.

Complaints Process

In the event that you make a privacy-related complaint to us, we will address the said complaint pursuant to its publicly posted complaints process as described in the [Terms of Use](#) which fully adheres to the Customer Care and Dispute Resolution Policy (the “CCDR”) pursuant to Section 24.02 of the OA.

In the event you exhaust our complaints process without what you believe to be a satisfactory resolution, you may request a copy of your case file, which we shall provide, in order to escalate the complaint to iGO. We will aid iGO in the investigation and handling of your complaint, all in accordance with the CCDR.

Security & Incident Breach Management and Cooperation

Protecting your personal information is of utmost importance and in this regard, we constantly strive to implement and maintain the security of your personal information, we have put in place appropriate physical and technological safeguards to help prevent unauthorized access, to maintain data security, and to properly use the information we collect from you. These safeguards vary based on the sensitivity of the information that we collect and store and include information security measures consistent with current best practices to protect our customers’ privacy. These measures include technical, procedural, monitoring and tracking steps intended to safeguard data from misuse, unauthorized access or disclosure, loss, alteration or destruction.

Although we take reasonable steps and employ appropriate security measures to safeguard information, the Internet is not completely secure. We cannot guarantee the security of your personal information and any transmission of your personal information through the Internet is at your own risk. We cannot be responsible for the acts of those who gain unauthorized access to your personal information, and we make no warranty, express, implied, or otherwise, that we will prevent such access or abuse. We will however promptly notify you if your personal information is impacted by a privacy breach that could reasonably result in a real risk of significant harm to you.

Our incident response plan provides a standardized and organized approach for handling security related incidents. If a security or privacy event is reported, resources involved will follow the Incident Response Process in conjunction with iGaming Ontario and take appropriate action.

Accessing, Correcting, or Deleting Your Personal Information

To the extent that certain provincial laws provide users with certain data subject rights, you may contact us as described below to exercise your rights, including requesting access to or deletion or correction of personal information and user information.

We take reasonable steps to ensure the information we use is accurate and current. To assist, please contact us immediately to update your information if it is not longer accurate and current.

Data Retention

Personal Information is retained for as long as needed to provide you with Services unless the law requires us to keep the information for a longer period of time.

How to Contact STX.

If you have any questions or concerns regarding this Privacy Policy, or if you would like to change your information, opt-out, delete, or unsubscribe from our use of your Personal Information, you may contact our Privacy Officer by email at: contactus@stxapp.io or by mail at:

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