

# STRUTTUR SPORTS

## Privacy Policy

Last Revised on February 1, 2023

This Privacy Policy for Struttur Sports Corp. and its affiliates (collectively, “Struttur Sports”, “we”, “us” “our”) describes how we collect, use and disclose information about (i) users of Struttur Sports’ website (struttursports.co), together with any other content, tools, features, services and functionality offered by Struttur Sports and (ii) any individuals who apply for jobs with Struttur Sports, including those who apply via the website (collectively, our “Platform”) or otherwise submit information through the Platform. For the purposes of this Privacy Policy, “you” and “your” means you as the user of the Platform or the job applicant.

### 1. UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date at the top of this Privacy Policy. If we make changes that are material, we will use reasonable efforts to attempt to provide notice to you and, where required by applicable law or otherwise in our discretion, we will obtain your consent. Notice may be by email to you at the last email address you provided us, by posting notice of such changes on the Platform, or by other means, consistent with applicable law. However, it is your sole responsibility to review the Privacy Policy from time to time to view any such changes. The updated Privacy Policy will be effective as of the time of posting, or such later date as may be specified in the updated Privacy Policy.

### 2. STRUTTUR SPORTS’ COLLECTION AND USE OF INFORMATION

When we provide you with the Platform, we may ask you to or you may provide us with certain details or information. We describe that information, and some examples of how we use it, in the following bullets:

- The following basic contact details: name, email, mailing address, and phone number. We collect basic contact details to communicate with you, to deliver merchandise or NFTs and for Platform and user security and compliance

- The following account information: username and password. We collect account information to help maintain and secure your account with us.

- The following profile information: if you create a profile, you can add a profile pic and bio. We use this profile information to help provide our services to you, such as to allow you to view and share your Struttur Sports NFTs.

- The following third party account information: If you log into our Platform through a third-party account (e.g., Google, Facebook, or Apple), then we collect information shared by that third party, which may include account ID (or username), profile picture, age group, pages you follow and email address. If you link other accounts we will also receive your username and related profile information. We use that information to facilitate interactions among our community members, enable certain functionality within our Platform and to provide utility associated with NFT purchases.

- The following job applicant details: name, email, phone number, information included in your resume, CV or other content you provide, details of your qualifications, skills, experience, education history and employment history, interview feedback, information we gather conducting reference checks, and work authorization status. We collect job applicant details in the context of your application for employment.

- The following information about your External Non-Custodial Wallet: address, public key, and any NFTs or other tokens held in your wallet. We collect your wallet information to associate your External Non-Custodial Wallet with your account on the Platform, if you choose to do so, and receive and/or store certain non-fungible tokens (“NFT’s”).

The following performance metrics: marketing channel traffic and purchaser demographics. We collect performance metrics in order to create aggregated, anonymized reports.

- The following information you choose to provide us through the Platform: information about your interests, date of birth and identifiers for interoperability. We collect information about your interests in order to better tailor the Platform to you, date of birth to verify you are old enough to use the Platform and interoperability information to connect you with third party accounts.

- The following information through the course of user research that you choose to disclose to us voluntarily: information about your interests, behaviors and preferences.

We use this information to create aggregated and anonymized reports to improve our Platform and services.

- Any other information you choose to include in communications with us, for example, when contacting us through the Platform.

Some features of the Platform may require you to enter certain information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features. Any information you provide in connection with those features will be used in connection with your use and access of those features.

We also automatically collect certain information about your interaction with the Platform (“Usage Data”). To do this, we may use cookies, web beacons/clear gifs, other geolocation tracking technologies (“Tracking Technologies”). Usage Data may include:

- Unique device identifier
- Device type, such as your phone, computer, or tablet
- IP address
- Browser type
- Wallet type
- Session data, such as page views, date and time stamps, such as the date and time you first accessed the Platform
- Operating system
- Transaction history
- Log data
- Approximate location, including latitude and longitude
- Time Zone
- Internally-generated user ID

Other information regarding your interaction with the Platform, such as clickstream data, ad impressions, primary market transactions and interactions with secondary marketplaces (as available on the blockchain), collectibles and collections.

We use the information we collect automatically to improve the functionality of the Platform, to facilitate transactions you initiate through the Platform, to serve advertisements as described in the “Advertising” section below, to improve the security of your account, to monitor and manage your usage of the Platform, to tailor features and content to you, and to run analytics and better understand user interaction with the Platform.

### Use of Information

In addition to the uses described above, we may also use the above information to:

- analyze, maintain, and improve our Platform;
- perform our contractual obligations, including but not limited to delivering content, services, digital assets, goods and merchandise;
- personalize our Platform for you;
- detect, investigate, and help prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity;
- send marketing communications and serve ads as described in the “Advertising” section below;
- comply with any applicable legal obligations (including, without limitation, legal prohibitions in transacting with certain wallet addresses);
- to enforce any applicable terms, including our **Terms of Service**; and
- to help protect or defend the Platform, our rights, the rights of our users, or others.

### Advertising

We use the information we collect about you to send you updates and marketing communications. We also engage third parties to serve advertisements across the web and in mobile apps. We and our partners may use this information to, among other things, deliver advertising and content targeted to your interests on our Platform and other websites and better understand your online activity. For more information about interest-based ads, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices).

We work with third parties to serve ads to you as part of customized campaigns on third-party platforms. As part of these ad campaigns, we or the third-parties may convert your email address and/or phone number into a unique value that can be matched with a user account on these platforms to allow us and these third parties to learn about your interests and serve you advertising that is customized to your interests. The third parties may offer you choices about whether you see these types of customized ads.

### 3. HOW STRUTTUR SPORTS SHARES YOUR INFORMATION

In certain circumstances, Struttur Sports may share your information with other parties. Such circumstances include the following or as otherwise described in this policy:

With vendors or other service providers, including the following:

- Payment processors
- Cloud storage providers
- Marketing services vendors
- Security vendors
- Compliance vendors
- Analytics services vendors
- Shipping, fulfillment and delivery vendors
- Utility vendors and/or other third parties providing utility
- Platform and website service providers
- Human resources service providers, including for processing job applications and conducting background checks.

With our affiliates or otherwise within our corporate group for the purposes described in this Privacy Policy

- With our platform partners to facilitate interoperability and the provision of the Platform to you and for you to make payments
- With our partners to perform our contractual obligations
- With our licensors to enforce applicable End User License Agreements
- To comply with applicable law or any obligations thereunder, including cooperation with law enforcement, judicial orders, and regulatory inquiries

- In connection with an asset sale, merger, bankruptcy, or other business transaction
- To enforce any applicable Terms of Service
- To help ensure the safety and security of Autograph and/or its users
- When you request us to share certain information with third parties, such as through your use of social media widgets or login integrations
- With professional advisors, such as auditors, law firms, or accounting firms
- With your consent or at your direction.

You acknowledge that such sharing of information may occur in all of the aforementioned circumstances and is permitted by and subject to this **Privacy Policy**

#### 4. COOKIES

Like most companies, we use cookies and similar technologies on our Platform. The technologies we use include the following:

- Cookies which are small data files stored on your browser or device.
- Pixels, which are small images on a web page or in an email. Pixels collect information about your browser or device and can set cookies and be used to track your use of or interaction with one or more websites.
- Local storage, which allows data to be stored locally on your browser or device and includes HTML5 local storage and browser cache

We refer to these technologies collectively as “**cookies**”. You can find information about cookies and how they work at [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### **FIRST PARTY AND THIRD PARTY COOKIES**

Some cookies are referred to as “first party” which means they are placed by the website you are visiting – so in our case first party cookies and pixels are placed by our Platform. “Third party” cookies are placed by other organizations (with our permission) via our Platform. They work by collecting information from your device and passing it directly back to the third party. For example, we partner with third-party analytics providers that set cookies when you visit our Platform.

#### **HOW DO WE USE COOKIES?**

We use cookies for a number of reasons, like helping us see which features of our Platform are most popular, counting visitors to a webpage, improving our users' experience, keeping our Platform secure, and generally providing you with a better experience. The cookies we use fall into one of the following categories:

Category	Sub-category	Why we use these cookies
Essential	Essential	These are cookies that are required for the operation of our Platform. They include, for example, cookies that enable you to log into secure areas or make purchases.
Non-Essential	Advertising	These cookies allow Struttur Sports or third party partners to collect information to measure advertising performance or show you relevant advertising on other sites, apps or platforms, including social media.
Non-Essential	Analytics	These cookies allow Struttur Sports or third party partners to measure and analyze performance and improve our Platform and services.

## YOUR CHOICES

You can control cookies by using the "Manage Cookies" function available through the link at the bottom of our homepage at [struttur.com](http://struttur.com).

If you clear cookies using your browser, you will be asked to consent to the placement and use of cookies again upon your next visit to our Platform.

Your browser will accept cookies and allow automatic collection of data unless you change the browser default settings. Most browsers allow you to manage your preferences with regard to cookies. We will always set our essential cookies and if you block these cookies using browser settings you may not be able to use certain parts of our Platform

## 5. USER GENERATED CONTENT

Certain features of the Platform may allow you to upload content (e.g., usernames, first name, last name, a profile picture, biography, chat conversations) directly to the Platform (“Your Content” or “UGC”). We or others may store, display, reproduce, publish, or otherwise use UGC, and may or may not attribute it to you. Others may also have access to UGC and may have the ability to share it with third parties. If you choose to submit UGC to any public area of the Platform, your UGC will be considered “public” and will be accessible by anyone, including Autograph.

Please note that we do not control who will have access to the information that you choose to make available to others, and cannot ensure that parties who have access to such information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the features permitting creation of UGC or what others do with information you share with them. We are not responsible for the accuracy, use or misuse of any such UGC that you disclose or receive from third parties.

## 6. SOCIAL FEATURES

Certain features of the Platform permit you to initiate interactions between the Platform and third-party services or platforms, such as social networks (“Social Features”). Social Features include features that allow you to click and access Struttur Sports’ pages on certain third-party platforms, such as Facebook, Twitter, Instagram, TikTok and Discord and from there to “like” or “share” our content on those platforms. Use of Social Features may entail a third party’s collection and/or use of your data. If you use Social Features or similar third-party services, information you post or otherwise make accessible may be publicly displayed by the third-party service you are using. Both Struttur Sports and the third party may have access to information about you and your use of both the Platform and the third-party service. For more information on third-party websites and platforms, see Section 7.

## 7. THIRD PARTY WEBSITES AND LINKS (INCLUDING WALLET EXTENSIONS)

Our Platform may contain links to other online platforms operated by third parties. We do not control such other online platforms and are not responsible for their content, their privacy policies, or their use of your information. Information you provide on public or semi-public venues, including information you share on third-party social networking platforms (such as Facebook, Twitter, Instagram, TikTok or Discord) may also be viewable by other users of the



Platform and/or users of those third-party online platforms without limitation as to its use by us or by a third party. Any information submitted by you directly to these third parties or through the use of third-party wallets to conduct transactions on the Platform is subject to the applicable third party's privacy policy.

#### 8. CHILDREN'S PRIVACY

Our platform is meant for individuals above the age of 16. We do not seek or knowingly collect any personal information about children under 13 years of age. If we become aware that we have unknowingly collected information about a child under 13 years of age, we will make commercially reasonable efforts to delete such information from our database. If you are the parent or guardian of a child under 13 years of age who has provided us with their personal information, you may contact us using the below information to request that it be deleted.

#### 9. DATA SECURITY

Please note that any information you send to us electronically, while using the Platform or otherwise interacting with us, may not be secure when it is transmitted to us. We recommend that you do not use unsecure channels to communicate sensitive or confidential information to us. Please be aware though that no security measures are perfect or impenetrable, and we cannot guarantee "perfect security." Any information you send us through any means is transmitted at your own risk.

#### 10. CANADA AND CALIFORNIA USER SPECIFIC TERMS

This section applies only to California residents and/or users based in Canada. For purposes of this Section 10, "personal information" for (a) California residents has the meaning given in the California Consumer Privacy Act ("CCPA") but does not include information exempted from the scope of the CCPA; and (b) users based in Canada has the meaning given in the Personal Information Protection and Electronic Documents Act (PIPEDA) or the relevant provincial privacy legislation but does not include information exempted from the scope of PIPEDA or the relevant provincial privacy legislation. In the past 12 months, we have collected the categories of information we set out in Section 2 above. We do not sell personal information to third parties and have not done so in the past 12 months. We do allow our marketing services vendors to collect information like your device and clickstream data through the use of cookies and pixels for targeted advertising. You can opt-out of such cookies or pixels being placed on your browser by clicking on "Manage Cookies" at the bottom of our homepage at [strutturports.co](http://strutturports.co).

The below table explains our current practices, related to the categories of personal information we collect about you, the purposes for collecting personal information and whether we disclose your personal information, and if so, to whom

Category of Information Collected	Source of Information	Purpose of Collection	Disclosure
<ul style="list-style-type: none"> <li>● Identifiers</li> <li>● Demographic information</li> <li>● Commercial Information</li> <li>● Location Information</li> <li>● Internet Activity</li> <li>● Professional or Employment Information</li> <li>● Education Information</li> <li>● Inferences</li> </ul>	<ul style="list-style-type: none"> <li>● User entry</li> <li>● User-linked third-party accounts</li> <li>● User's browser</li> <li>● Partner APIs</li> <li>● Public blockchain networks</li> <li>● User's IP address</li> <li>● User's social media accounts</li> </ul>	<ul style="list-style-type: none"> <li>● To secure and maintain your account and give you access to the Platform</li> <li>● To allow you to buy, sell, view and share NFTs and to provide utility associated with NFTs</li> <li>● To communicate with you, including send marketing messages and serve advertisements</li> <li>● To facilitate login and promote user and Platform security and compliance</li> <li>● To monitor use of</li> </ul>	<ul style="list-style-type: none"> <li>● Cloud storage providers</li> <li>● Marketing services vendors</li> <li>● Compliance and security vendors</li> <li>● Platform partners</li> <li>● Analytics services vendors</li> <li>● Payment processors</li> <li>● Service providers that help with human resources services and processing job applications</li> </ul>

		<p>the Platform, run analytics, and improve the functionality of the Platform;</p> <ul style="list-style-type: none"> <li>• To provide and enable certain functionalities of the Platform</li> <li>• To better tailor the Platform to you and ensure appropriate access to the Platform and related content</li> <li>• To evaluate your candidacy for various roles and/or process your application for employment</li> </ul>	
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You may have the rights listed below in relation to personal information we have collected about you. However, these rights are not absolute, and in certain cases, we may decline your request as permitted by law.

Right to Know Request. You have a right to request the following information about our collection, use and disclosure of your personal information over the prior 12 months and ask that we provide you with a copy of the following information:

- Categories of and specific pieces of personal information we have collected about you;
- Categories of sources from which we collect personal information;
- The business of commercial purposes for collecting personal information;
- Categories of third parties to whom the personal information was disclosed for a business purpose; and
- Categories of personal information disclosed about you for a business purpose.

Right to Delete Request. Under the CCPA, you have a right to request that we delete personal information, subject to certain exceptions.

- Right to Update. You have a right to update and/or correct any personal information we have collected and which continues to be needed for the purposes described in this Privacy Policy.

You may make a request described above by contacting us (See Section 12. How To Contact Us). We may need to collect information from you to verify your identity before providing a substantive response to the request. You may designate, in writing or through a power of attorney document, an authorized agent to make requests on your behalf to exercise your rights. Before accepting such a request from an agent, we will require that the agent provide proof you have authorized them to act on your behalf, and we may need you to verify your identity directly with us.

You may directly make a Right to Know request by logging into your account and selecting Settings > Your Data > Request Data. You may also request an account deletion by selecting Settings > Delete Account.

Please note that deleting your data will also lead to loss of access to your Struttur Sports' Wallet. Please make sure to transfer any assets from the Struttur Sports' Wallet before initiating a deletion.

Sharing for Direct Marketing Purposes California law permits users in California to request certain details about how their "personal information" (as defined in California Civil Code Section 1798.83) is shared with third parties for direct marketing purposes.

With your consent or at your direction, we may share certain “personal information” about you with third parties for those third parties’ direct marketing purposes. For example, if you visit our booth at an event and provide consent, we will disclose your email address to the event organizer. Accordingly, Struttur Sports’ qualifies for the exemption available to companies that seek opt-in consent prior to disclosing for marketing purposes.

#### Users Under 18

Any California residents under the age of 18 who have registered to use the Platform, and who have posted content or information on the Platform, can request that such information be removed from the Platform by contacting us at the e-mail or address set forth in the “How to Contact Us” section below. Such a request must state that they personally posted such content or information and detail where the content or information is posted. We will make reasonable good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified. This removal process cannot ensure complete or comprehensive removal.

For instance, third-parties may have republished the post and archived copies of it may be stored by search engines and others that we do not control.

We will not discriminate against you for exercising any of your rights under the CCPA or similar laws of other jurisdictions, as applicable.

#### 11. OTHER INTERNATIONAL USER SPECIFIC TERMS

If you are located in the European Economic Area (“EEA”), the United Kingdom, or Switzerland, you have certain rights and protections under the law regarding the processing of your personal data, and this section applies to you.

#### Legal Basis for Processing

When we process your personal data, we will do so in reliance on the following lawful bases:

To perform our responsibilities under our contract with you (e.g., providing the NFTs you buy and the related utility).

- When we have a legitimate interest in processing your personal data to operate our business or protect our interests (e.g., to provide, maintain, and improve our products and services, conduct data analytics, and communicate with you).
- To comply with our legal obligations (e.g., to maintain a record of your consents and track those who have opted out of marketing communications).
- When we have your consent to do so (e.g., when you opt in to receive marketing communications from us). When consent is the legal basis for our processing of your personal data, you may withdraw such consent at any time.

#### Data Retention

We store personal data for as long as necessary to carry out the purposes for which we originally collected it and for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

#### Data Subject Requests

Subject to certain limitations, you have the right to request access to the personal data we hold about you and to receive your data in a portable format, the right to ask that your personal data be corrected or erased, and the right to object to, or request that we restrict, certain processing. Please contact us to exercise any of these rights.

#### Questions or Complaints

If you have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside.

Contact details for your Data Protection Authority can be found using the links below:

For individuals in the EEA: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en) For individuals in the UK: <https://ico.org.uk/global/contact-us/>

For individuals in Switzerland:

<https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html>

## 12. HOW TO CONTACT US

Should you have any questions about our privacy practices or this Privacy Policy, please email us at [info@struttursports.co](mailto:info@struttursports.co), contact us at 169 Madison Avenue New York City, New York 10016, or call us at (613) 929-7275.