

PRIVACY POLICY

Last Updated: 4/18/2024

This Privacy Policy is designed to help you understand how the Super Champs Protocol Foundation (called the “**CHAMPS Foundation**”, “**we**,” “**us**,” and “**our**”) collects, uses, and shares your personal information and to help you understand and exercise your privacy rights.

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1. Scope

This Privacy Policy applies to personal information processed by us, including on our website located at superchamps.com (the “**Site**”). To make this Privacy Policy easier to read, the “**Site**” refers to both our Site and the content and functionalities accessible via the Site. For the avoidance of doubt, this Privacy Policy does not apply to the decentralized digital ecosystem developed by the Super Champs Protocol Foundation (the “**Protocol**”) and the Super Champs Protocol Foundation (the “**CHAMPS Foundation**”) cannot control activity and data on the Protocol, the validation of transactions on the Protocol, or use of the Protocol. The Protocol is an open-source protocol that is maintained and processed by validators across the globe.

2. Change to Our Privacy Policy

We may revise this Privacy Policy from time to time at our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Site after the new Privacy Policy takes effect.

3. Personal Information We Collect

The categories of personal information we collect depend on how you interact with us, our Site, and the requirements of applicable law. We collect information that you provide to us, information we obtain automatically when you use our Site, and information from other sources such as third-party services and organizations, as described below.

a. Information You Provide to Us Directly. We may collect the following personal information that you provide to us:

i. *Account Creation*. We may collect information if you create an account with us, such as your name, username, email address, or password.

ii. *Wallet and Transaction Information*. In order to engage in transactions on the Site, you may need to provide us or our third-party payment processors with access to or information about your digital wallet. We will never ask you for or collect your private key(s).

iii. *Other Transactions*. We may collect personal information and details associated with your activities on our Site, including token issuance. Any payments made via our Site are processed by third-party payment processors and subject to their privacy policies.

iv. *Your Communications with Us*. We may collect personal information, such as email address, when you request information about our Site, register for our newsletter or marketing promotions, request customer or technical support, apply for a job or otherwise communicate with us.

v. *Interactive Features*. We and others who use our Site may collect personal information that you submit or make available through our interactive features (e.g., via the CHAMPS Foundation community, messaging and chat features, commenting functionalities, forums, blogs, and social media pages). Any personal information you provide on the public sections of these features will be considered “public” (the “*User Content*”) unless otherwise required by applicable law, and is not subject to the privacy protections referenced herein. Please exercise caution before revealing any information that may identify you in the real world to other users.

vi. *Surveys*. We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information that may include personal information.

vii. *Sweepstakes, Giveaways, or Contests.* We may collect personal information you provide for any sweepstakes, giveaways, or contests that we offer. In some jurisdictions, we are required to publicly share information of sweepstakes and contest winners.

viii. *Conferences, Trade Shows, and Other Events.* We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.

ix. *Business Development and Strategic Partnerships.* We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.

x. *Job Applications.* We may post job openings and opportunities on our Site. If you reply to one of these postings by submitting your application, CV, and/or cover letter to us, we will collect and use this information to assess your qualifications.

b. Information Collected Automatically. We may collect personal information automatically when you use our Site:

i. *Automatic Data Collection.* We may collect certain information automatically when you use our Site, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, mobile advertising and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), Internet service provider, and metadata about the content you provide. We may also automatically collect information regarding your use of our Site, such as pages that you visit before, during, and after using our Site, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Site.

ii. *Cookie Policy for Cookies, Pixel Tags/Web Beacons, and Other Technologies.* We, as well as third parties that provide content, advertising, or other functionality on our Site, may use cookies, pixel tags, local storage, and other technologies (“**Technologies**”) to automatically collect information through your use of our Site.

A. Cookies. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.

B. Pixel Tags/Web Beacons and Other Technologies. A pixel tag (also known as a web beacon) is a piece of code embedded in our Site that collects information about engagement on our Site. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement. We may also include web beacons in emails to understand whether messages have been opened, acted on, or forwarded.

iii. *Uses of Technology.* Our uses of these Technologies fall into the following general categories:

A. Operationally Necessary. This includes Technologies that allow you access to our Site, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;

B. Performance-Related. We may use Technologies to assess the performance of our Site, including as part of our analytic practices to help us understand how individuals use our Site (see “Analytics” below);

C. Functionality-Related. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Site. This may include identifying you when you sign into our Site or keeping track of your specified preferences, interests, or past items viewed;

D. Advertising- or Targeting-Related. We may use first-party or third-party Technologies to deliver content, including ads relevant to your interests, on our Site or on third-party websites.

See “Your Privacy Choices and Rights” below to understand your choices regarding these Technologies.

iv. *Analytics*. We may use our Technologies and other third-party tools to process analytics information on our Site. These technologies allow us to process usage data to better understand how our website and web-related services are used, and to continually improve and personalize our Site. Some of our analytics partners may include:

A. Google Analytics. For more information about how Google uses your data (including for its own purposes, e.g., for profiling or linking it to other data), please visit [Google Analytics Privacy Policy](#). To learn more about how to opt-out of Google Analytics use of your information, please click [here](#).

B. Intercom. For more information about how Intercom uses your data for customer interaction purposes, please visit [Intercom's Privacy Policy](#).

C. Mixpanel. For more information about how Mixpanel uses your data for customer interaction purposes, please visit [Mixpanel's Privacy Policy](#).

D. Segment. For more information about how Segment uses your data for customer interaction purposes, please visit [Segment's Privacy Policy](#).

E. Social Media Platforms. Our Site may contain social media buttons, such as Discord, Snapchat, Twitter, and Telegram that might include widgets such as the “share this” button or other interactive mini programs. These features may collect your IP address and which page you are visiting on our Site, and may set a cookie to enable the feature to function properly. Your interactions with these platforms are governed by the privacy policy of the company providing it.

c. Information Collected from Other Sources.

i. *Third-Party Sources.* We may obtain information about you from other sources, including through third-party services and organizations. For example, if you access our Site through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings.

ii. *Referrals, Sharing, and Other Features.* Our Site may offer various tools and functionalities that allow you to provide information about your friends through our referral service; third parties may also use these services to upload information about you. Our referral services may also allow you to forward or share certain content with a friend or colleague, such as an email inviting your friend to use our Site. Please only share with us contact information of people with whom you have a relationship (e.g., relative, friend, neighbor, or co-worker).

4. How We Use Your Information

We use your information for a variety of business purposes, including to provide our Site, for administrative purposes, and to market our products and services, as described below.

a. Provide Our Site. We use your information to fulfill our contract with you and provide you with our Site and perform our contract with you, such as:

- i. Managing your information and accounts;
- ii. Providing access to certain areas, functionalities, and features of our Site;
- iii. Answering requests for customer or technical support;
- iv. Communicating with you about your account, activities on our Site, and policy changes;
- v. Processing information about your wallet to facilitate transfers via the Site;
- vi. Processing applications if you apply for a job we post on our Site; and
- vii. Allowing you to register for events.

b. Administrative Matters. We use your information for our legitimate interest, such as:

- i. Pursuing our legitimate interests such as direct marketing, research and development (including marketing research), network and information security, and fraud prevention;
- ii. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- iii. Measuring interest and engagement in our Site;
- iv. Improving, upgrading, or enhancing our Site;
- v. Developing new products;
- vi. Ensuring internal quality control and safety;

- vii. Authenticating and verifying individual identities;
- viii. Debugging to identify and repair errors with our Site;
- ix. Auditing relating to interactions, transfers, and other compliance activities;
- x. Sharing information with third parties as needed to provide the Site;
- xi. Enforcing our agreements and policies; and
- xii. Other uses as required to comply with our legal obligations.

c. Marketing and Advertising Our Products and Services. We may use personal information to tailor and provide you with content and advertisements. We may provide you with these materials as permitted by applicable law.

Some of the ways we may market to you include email campaigns, custom audiences advertising, and “interest-based” or “personalized advertising,” including through cross-device tracking.

If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in “Contact Us” below.

d. With Your Consent. We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

e. Other Purposes. We also use your information for other purposes as requested by you or as permitted by applicable law.

i. *Automated Decision-Making.* We may engage in automated decision-making, including profiling. The CHAMPS Foundation's processing of your personal information will not result in a decision based solely on automated processing that significantly affects you unless such a decision is necessary as part of a contract we have with you, we have your consent, or we are permitted by law to engage in such automated-decision making. If you have questions about our automated decision-making, you may contact us as set forth in “Contact Us” below.

ii. *De-identified and Aggregated Information.* We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, de-identified location information, information about the device from which you access our Site, or other analyses we create.

5. How We Disclose Your Information

We disclose your information to third parties for a variety of business purposes, including to provide our Site, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

a. Disclosures to Provide Our Site. The categories of third parties with whom we may share your information are described below.

i. *Notice Regarding Use of Blockchain.* Transactions involving the units of value denominated as CHAMP Tokens (“**CHAMP Tokens**”) will be conducted via the BASE blockchain. Information about your transfers will be provided to the blockchain and may be accessible to third parties due to the public nature of the blockchain. Because entries to the blockchain are, by their nature, public, and because it may be possible for someone to identify you through your pseudonymous, public wallet address using external sources of information, any transaction you enter onto the blockchain could possibly be used to identify you or information about you.

ii. *Other Users of the Site and Parties You Transact With.* Some of your personal information may be visible to other users of the Site (e.g., information featured on generally accessible parts of your profile). In addition, to complete transfers via the Site, we will need to share some of your personal information with the party that you are transacting with.

iii. *Third-Party Websites and Applications.* You may choose to share personal information or interact with third-party websites and/or third-party applications, including, but not limited to, third-party electronic wallet extensions. Once your personal information has been shared with a third-party website or a third-party application, it will also be subject to such third-party’s privacy policy. We encourage you to closely read each third-party website or third-party application privacy policy before sharing your personal information or otherwise interacting with them. Please note that we do not control, and we are not responsible for the third-party website’s or the third-party application’s processing of your personal information.

iv. *Service Providers.* We may share your personal information with our third-party service providers who use that information to help us provide our Site. This includes service providers that provide us with IT support, hosting, customer service, and related services.

v. *Business Partners.* We may share your personal information with business partners to provide you with a product or service you have requested. We may also share your personal information to business partners with whom we jointly offer products or services.

vi. *Affiliates.* We may share your personal information with members of our corporate family.

vii. *Advertising Partners.* We may share your personal information with third-party advertising partners. These third-party advertising partners may set Technologies and other tracking tools on our Site to collect information regarding your activities and your device (e.g., your IP address, cookie identifiers, page(s) visited, location, time of day). These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks. This practice is commonly referred to as “interest-based advertising” or “personalized advertising.”

viii. *APIs/SDKs.* We may use third-party application program interfaces (“*APIs*”) and software development kits (“*SDKs*”) as part of the functionality of our Site. For more information about our use of APIs and SDKs, please contact us as set forth in “Contact Us” below.

b. Disclosures to Protect Us or Others. We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others’ rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

c. Disclosure in the Event of Merger, Sale, or Other Asset Transfers. If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

6. Your Privacy Choices and Rights

a. Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

i. *Email Communications.* If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transfer-related emails regarding services you have requested. We may also send you certain non-promotional communications regarding us and our Site, and you will not be able to opt out of those communications (e.g., communications regarding our Site or updates to our Terms of Use or this Privacy Policy).

ii. *Text Messages.* You may opt out of receiving text messages from us by following the instructions in the text message you have received from us or by otherwise contacting us.

iii. *Mobile Devices.* We may send you push notifications through our mobile application. You may opt out from receiving these push notifications by changing the settings on your mobile device. With your consent, we may also collect precise location-based information via our mobile application. You may opt out of this collection by changing the settings on your mobile device.

iv. *“Do Not Track.”* Do Not Track (“*DNT*”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

v. *Cookies and Interest-Based Advertising.* You may stop or restrict the placement of Technologies on your device or remove them by adjusting your preferences as your browser or device permits. However, if you adjust your preferences, our Site may not work properly. Please note that cookie-based opt-outs are not effective on mobile applications. However, you may opt-out of personalized advertisements on some mobile applications by following the instructions for Android, iOS, and others. Please note you must separately opt out in each browser and on each device.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy by visiting the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#), the [European Digital Advertising Alliance](#), and the [Digital Advertising Alliance of Canada](#).

b. Your Privacy Rights. In accordance with applicable law, you may have the right to:

i. *Access Personal Information* about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; or (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company (aka the right of data portability);

ii. *Request Correction* of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;

iii. *Request Deletion* of your personal information;

iv. *Request Restriction of or Object to* our processing of your personal information, including where the processing of your personal information is based on our legitimate interest or for direct marketing purposes; and

v. *Withdraw Your Consent* to our processing of your personal information. Please note that your withdrawal will only take effect for future processing and will not affect the lawfulness of processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.

7. Security of Your Information

We take steps designed to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot

guarantee or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Site or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Site. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Site, by mail, or by sending an email to you.

8. International Data Transfers

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

9. Retention of Personal Information

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

10. Supplemental Notice for California Residents

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 (“**CCPA**”). The CHAMPS Foundation does not believe it is subject to the CCPA. That said, the CHAMPS Foundation provides this supplemental notice for purposes of transparency. The CCPA provides California residents with the right to know what categories of personal information the CHAMPS Foundation has collected about them and whether the CHAMPS Foundation disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding twelve months. California residents can find this information below:

<p align="center"><u>Category of Personal Information Collected by the CHAMPS Foundation</u></p>	<p align="center"><u>Categories of Third Parties to whom Personal Information may be Disclosed for a Business Purpose</u></p>
<p>Identifiers</p> <p>A real name, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.</p>	<ul style="list-style-type: none"> • Service providers • Third-party websites or applications • Blockchain networks • Other users or third parties you interact with • Advertising partners
<p>Personal information categories listed in Cal. Civ. Code § 1798.80(e)</p> <p>A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information. Personal information does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records. Note: Some personal information included in this category may overlap with other categories</p>	<ul style="list-style-type: none"> • Service providers • Third-party websites or applications (e.g., wallet providers; third-party identity verification services) • Blockchain networks • Other users or third parties you interact with
<p>Protected classification characteristics under California or federal law</p> <p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<ul style="list-style-type: none"> • Service providers (recruitment context)

<u>Category of Personal Information Collected by the CHAMPS Foundation</u>	<u>Categories of Third Parties to whom Personal Information may be Disclosed for a Business Purpose</u>
Commercial information Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Service providers • Blockchain networks • Other users or third parties you interact with
Internet or other electronic network activity Browsing history, search history, information on a consumer's interaction with an Internet website, application, or advertisement.	<ul style="list-style-type: none"> • Service providers • Blockchain networks • Other users or third parties you interact with • Advertising partners
Professional or employment-related information Current or past job history or performance evaluations.	<ul style="list-style-type: none"> • Service providers
Inferences drawn from other personal information to create a profile about a consumer Profile reflecting a consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<ul style="list-style-type: none"> • Service providers • Advertising partners

The categories of sources from which we collect personal information and our business and commercial purposes for using personal information are set forth in “Personal Information We Collect” and “How We Use Your Information” above, respectively.

“Sales” of Personal Information under the CCPA. For purposes of the CCPA, the CHAMPS Foundation does not “sell” personal information, nor do we have actual knowledge of any “sale” of personal information of minors under 16 years of age.

11. Additional Privacy Rights for California Residents

- a. Non-Discrimination. California residents have the right not to receive discriminatory treatment by us for the exercise of their rights conferred by the CCPA.
- b. Authorized Agent. Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. To designate an authorized agent, please contact us as set forth in “Contact Us” below.
- c. Verification. When you make a request, we will ask you to provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include confirming the email address associated with any personal information we have about you. If you are a California resident and would like to exercise any of your rights under the CCPA, please contact us as set forth in “Contact Us” below. We will process such requests in accordance with applicable laws.
- d. Accessibility. This Privacy Policy uses industry-standard technologies and was developed in line with the World Wide Web Consortium’s Web Content Accessibility Guidelines, version 2.1. If you wish to print this policy, please do so from your web browser or by saving the page as a PDF.
- e. California Shine the Light. The California “Shine the Light” law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the type of personal information disclosed to those parties.

12. Supplemental Notice for Nevada Residents

If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties who intend to license or sell that personal information. You can exercise this right by contacting us as set forth in “Contact Us” below with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A.

13. Children’s Information

You must be at least 18 years old to use the Site, and the Site is not directed to children under 13 (or other age as required by local law) and we do not knowingly collect personal information from children. If you learn that your child has provided us with personal information without your consent, you may contact us as set forth in “Contact Us” below. If we learn that we

have collected a child's personal information in violation of applicable law, we will promptly take steps to delete such information.

14. Third-Party Websites / Applications

The Site may contain links to other websites/applications and other websites/applications may reference or link to our Site. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

15. Supervisory Authority

If you are located in the European Economic Area, Switzerland, or the United Kingdom you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

16. Contact Us

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

The Super Champs Protocol Foundation
contact@superchamps.com