



Future Phenom FLAG – Privacy Policy

This Privacy Policy (the “**Privacy Policy**”) describes the ways in which Train & Play Sports, Inc., d/b/a Future Phenom FLAG (“**FP FLAG**”), and **FP FLAG**’s affiliates and subsidiaries, including without limitation Elite Sports Marketing, Inc. and Future Phenom Football (together with **Future Phenom FLAG**, collectively, “**FP FLAG**”) treats the information you provide while using <https://www.futurephenomflag.com> (the “**Website**”). **FP FLAG**’s goal is to provide you with information regarding any youth flag football leagues, camps, tournaments or other services of **FP FLAG** (collectively, “**Services**”) while protecting your privacy. **FP FLAG** respects the privacy of the individuals that use the Website, and this Privacy Policy describes how **FP FLAG** processes the Personal Data it collects or receives from users of the Website. “**Personal Data**” is information that can be used either directly or indirectly to identify an individual (you), including, but not limited to, name, email address, physical address, Internet Protocol (“**IP**”) address, mobile ad identifier, and your interactions with the Website that are connected to other identifying information such as name, email address, physical address, and IP address. This Privacy Policy also addresses Personal Data that falls into the scope of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, known as the General Data Protection Regulation (“**GDPR**”), in case Personal Data processed by **FP FLAG** is governed by the GDPR. However, your information, including Personal Data, will be stored in the United States.

Please read this Privacy Policy carefully. You can access the Privacy Policy at any time. Your use of and/or registration on any aspect of the Website or the Services constitutes your agreement to this Privacy Policy. By using the Website or receiving the Services, or by permitting your child to use the Website or receive the Services, you give an explicit and informed consent to the collection, use, and processing of your Personal Data in accordance with this Privacy Policy. If you cannot agree with the terms and conditions of this Privacy Policy, please do not use the Website or receive the Services. This Privacy Policy does not cover information collected elsewhere, including without limitation offline and on websites linked to and from the Website.

In addition to reviewing this Privacy Policy, please read **FP FLAG**’s Terms and Conditions. Your use of the Website or receipt of the Services constitutes your agreement to **FP FLAG**’s Terms and Conditions as well.

This Privacy Policy may be modified from time to time. The date of the most recent version will appear on this page, so check back often. Continued use of the Website or receipt of the Services by you will constitute your acceptance of any changes or revisions to the Privacy Policy.

What Type of Information Does FP FLAG Collect?

Personal Data

The Website generally only requests an individual’s name and e-mail address. If at any time the Website was to collect other Personal Data, such as your full name, address, or telephone number, it would only be with your specific knowledge and consent. For instance, if the Website began to offer Services, sweepstakes, lotteries, or promotions, and you wish to register or participate, **FP FLAG** may require personally identifiable information to register for the Services or to otherwise contact you in case you win.

FP FLAG servers may also automatically collect information about your computer when you visit the Website, including without limitation the type of browser software you use, the operating system you are running, the website that referred you, and your IP address.

Non-Identifiable Information

Additionally, **FP FLAG** may collect and compile information related to your use of the Website which does not constitute Personal Data, such as time, date, browser type, browser language, operating system, and the domain name of your internet service provider (collectively, the “**Non-Identifiable Information**”) as part of the operation of this Website, or during the course of your activities on or use of this Website.

Does FP FLAG Use Cookies and Tracking Technologies?

FP FLAG uses cookies, and/or other similar tracking technology, in connection with operation of the Website to help **FP FLAG** personalize and tailor its services and improve the quality of those services by tracking and storing user preferences, trends, and patterns. Cookies are small pieces of information that are stored on your computer by **FP FLAG**'s website server. **FP FLAG**'s cookies may contain Personal Data and such cookies may be shared with **FP FLAG**'s affiliates, subsidiaries and other third-party companies. If you visit any restricted access or password protected portions of the Website, you may be required to use cookies, which may include or be linked to Personal Data. The use of cookies is common in the industry, and they are used by most major websites. You may customize your browser to automatically inform you whenever a cookie is to be used or refuse all cookies but doing so may impair or prevent the performance of certain functions of the Website and may not permit access to some areas of the Website. For more information on cookies, see <http://www.cookiecentral.com/faq.htm>.

Some of **FP FLAG**'s advertisers may occasionally serve you cookies as well. **FP FLAG** does not have control over cookies placed by advertisers.

FP FLAG may also use advertising service vendors to help present advertisements on the Website. These vendors may use cookies, web beacons, or similar technologies to serve you advertisements tailored to interests you have shown by browsing on this and other sites you have visited, to determine whether you have seen a particular advertisement before and to avoid sending you duplicate advertisements. In doing so, these vendors may collect non-personal data such as your browser type, your operating system, Web pages visited, time of visits, content viewed, ads viewed, and other clickstream data. The use of cookies, web beacons, or similar technologies by these advertising service vendors is subject to their own privacy policies, not **FP FLAG**'s Privacy Policy, and **FP FLAG** disclaims all liability in connection therewith.

How Does FP FLAG Use Your Personal Data and Non-Identifiable Information?

FP FLAG will use Personal Data for the purpose of which you provided it, such as providing you with **FP FLAG**'s products and Services, processing transactions, and communicating with you. For instance, if you submit an order or register for Services on the Website, **FP FLAG** uses your Personal Data to process and complete your registration or order. If you provide Personal Data in a search query, **FP FLAG** uses that Personal Data to provide you search results. If you submit an online inquiry or correspondence to **FP FLAG** and include Personal Data, **FP FLAG** uses the Personal Data to respond to you. **FP FLAG** also uses your information, including Personal Data, to provide you customer support. In this respect, **FP FLAG** always reserves the right to contact you about customer service issues. **FP FLAG** may also use your Personal Data to carry out its obligations and enforce its rights arising from any contracts and/or transactions entered into between you and **FP FLAG**, including for billing and collection purposes, any other purpose allowed by applicable law, or in any other way **FP FLAG** may describe when you provide Personal Data, as well as for any other purpose with your consent. Generally, the Non-Identifiable Information is used to provide better services to users and to improve the Website.

In nearly all cases, the above-described Personal Data may be collected or processed by, and transferred to, **FP FLAG**'s servers located in the United States. This may be done through the Website's Internet Service Provider ("ISP"), or through the use of such tools as Google Analytics. This information is gathered to improve the quality of **FP FLAG**'s services and **FP FLAG**'s ability to market those products and services to specific individuals and organizations that could benefit from them. The Website uses Google Analytics in accordance with the Google Privacy Policy (<http://www.google.com/policies/privacy>).

How and When Does FP FLAG Disclose Your Information to Third Parties?

Except as described herein, **FP FLAG** does not sell, trade, or otherwise transfer your Personal Data to outside third parties. However, this does not include **FP FLAG**'s affiliates, subsidiaries, or trusted third parties who assist **FP FLAG** in operating the Website, providing the Services, conducting **FP FLAG**'s business, or otherwise servicing you, so long as those parties agree to keep your information confidential. Additionally, Non-Identifiable Information and Personal Data about you may be disclosed and shared with advertisers, business partners, sponsors, and other third parties under the following limited circumstances: **FP FLAG** may disclose (a) the frequency of visits to the Website by the average user, (b) information to third parties assisting **FP FLAG** in carrying out a transaction or providing a service for you (e.g., packaging, sending, and delivering purchases and information to you; clearing transactions; performing statistical analyses of **FP FLAG**'s services; and performing Services), or (c) information in connection with merger and acquisition discussions.

FP FLAG may share data, including Personal Data about you, with **FP FLAG** affiliates, partners, subsidiaries, and third parties who provide services on behalf of **FP FLAG**, provided that they are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes of which **FP FLAG** has disclosed to them. To the extent that these entities have access to your Personal Data, they will have agreed with **FP FLAG** to follow this Privacy Policy, or already have privacy practices substantively no less protective than **FP FLAG**'s practices described in this Privacy Policy, to the extent allowed by applicable law.

FP FLAG will release information, including Personal Data, in connection with any valid law, regulation, or legal process (such as a search warrant, subpoena, statute or court order). **FP FLAG** may disclose Personal Data to protect or enforce the rights, property, or safety of **FP FLAG**, its users, or other third parties, including the disclosure of information with other third-party organizations relating to fraud protection and credit risk reduction.

FP FLAG may provide Personal Data to **FP FLAG**'s trusted businesses or persons for processing based on **FP FLAG**'s instructions, and in compliance with **FP FLAG**'s Privacy Policy and any other appropriate confidentiality and security measures.

Generally, and except as indicated at the time of collection, **FP FLAG** does not sell or lease any Personal Data about you to any third party. However, **FP FLAG** may aggregate information (gather up data across all user accounts) in a manner that creates Non-Identifiable Information and disclose such information to advertisers and other third parties for other marketing and promotional purposes. In these situations, **FP FLAG** does not disclose to these entities any Personal Data.

You may choose to opt-out of allowing **FP FLAG** to provide Non-Identifiable Information to certain third parties. Visit networkadvertising.org, aboutads.info, and jumptap.com to make informed decisions about your online and mobile privacy and to opt-out.

In the event that **FP FLAG** is, or substantially all of its assets are, sold or otherwise transferred, all information, including Personal Data, **FP FLAG** has about you may be included in the transferred assets. The same applies in case of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of **FP FLAG**'s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by **FP FLAG** is among the assets transferred.

How Does FP FLAG Protect Your Information?

FP FLAG uses commercially reasonable technical, physical, operational, security, and procedural safeguards to protect Personal Data from loss, misuse, alteration, and unauthorized access or

disclosure. **FP FLAG**'s security measures may include: password protected directories and databases to safeguard your information, Secure Sockets Layered ("SSL") technology to ensure that your information is fully encrypted and sent across the Internet securely or Payment Card Industry ("PCI") scanning to actively protect **FP FLAG**'s servers from hackers and other vulnerabilities. Additionally, **FP FLAG** offers the use of a secure server. All supplied sensitive/credit information is transmitted via SSL technology and then encrypted into **FP FLAG**'s payment gateway providers database only to be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. After a transaction, your private information (credit cards, social security numbers, financials, etc.) will not be stored on **FP FLAG**'s servers.

Due to the nature of **FP FLAG**'s business, including its dependence on the public Internet, **FP FLAG** cannot ultimately ensure that private communications and Personal Data will not be intercepted by third parties or otherwise obtained in ways not described in this Privacy Policy. Although **FP FLAG** attempts to protect the privacy of users, **FP FLAG** cannot absolutely guarantee that such information will remain private or secure. While no security measure can guarantee against compromise, **FP FLAG** regularly reviews and updates its security measures in an effort to provide appropriate security for all information held by **FP FLAG**.

Processing Personal Data According to GDPR

In case you are from the European Economic Area ("EEA") and the processing of your Personal Data falls within the scope of the GDPR, **FP FLAG** shall perform such processing in accordance with GDPR requirements. Therefore, in addition to the above terms, **FP FLAG** provides you with the following information:

(a) You are entitled to:

- **Request access** to your Personal Data. This enables you to receive a copy of the Personal Data **FP FLAG** holds about you and to check that **FP FLAG** is lawfully processing it.
- **Request correction** of the Personal Data that **FP FLAG** retains about you. This enables you to have any incomplete or inaccurate Personal Data **FP FLAG** retains about you corrected, though **FP FLAG** may need to verify the accuracy of the new data you provide.
- **Request erasure** of your Personal Data. This enables you to ask **FP FLAG** to delete or remove Personal Data where there is no good reason for **FP FLAG** continuing to process it. You also have the right to ask **FP FLAG** to delete or remove your Personal Data where you have successfully exercised your right to object to processing, where **FP FLAG** may have processed your information unlawfully, or where **FP FLAG** is required to erase your Personal Data to comply with local law. Note, however, that **FP FLAG** may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your Personal Data where **FP FLAG** is relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where **FP FLAG** is processing your Personal Data for direct marketing purposes. In some cases, **FP FLAG** may demonstrate that it has compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your Personal Data. This enables you to ask **FP FLAG** to suspend the processing of your Personal Data in the following scenarios: (a) if you want **FP FLAG** to establish the data's accuracy; (b) where **FP FLAG**'s use of the data is unlawful, but you do not want **FP FLAG** to erase it; (c) where you need **FP FLAG** to hold the data even if **FP FLAG** no longer requires it as you need it to establish, exercise, or defend legal claims; or (d) you have objected to **FP FLAG**'s use of your data but **FP FLAG** needs to verify whether it has overriding legitimate grounds to use it.
- **Request the transfer** of your Personal Data to you or to a third party. **FP FLAG** will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you

initially provided consent for **FP FLAG** to use or where **FP FLAG** used the information to perform a contract with you.

• **Withdraw consent at any time** where **FP FLAG** is relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, **FP FLAG** may not be able to provide certain products or services to you. **FP FLAG** will advise you if this is the case at the time you withdraw your consent.

(b) You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, at **FP FLAG**'s discretion, **FP FLAG** may charge a reasonable fee if your request is clearly unfounded, repetitive, unduly burdensome, or excessive. Alternatively, **FP FLAG** may refuse to comply with your request in these circumstances.

(c) **FP FLAG** may need to request specific information from you to help **FP FLAG** confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure personal data is not disclosed to any person who has no right to receive it. **FP FLAG** may also contact you to ask you for further information in relation to your request to speed up our response.

(d) **FP FLAG** tries to respond to all legitimate requests within one (1) month. Occasionally, it may take **FP FLAG** longer than one (1) month if your request is particularly complex, or if you have made a number of requests. In this case, **FP FLAG** will notify you and keep you updated as to the status of your request.

(e) **FP FLAG** does not perform automated decision-making, including profiling.

(f) Unless necessary and legally permissible, **FP FLAG** does not intend to transfer Personal Data to a third country located outside of the United States or international organization.

(g) You may at any time lodge a complaint with a supervisory authority located in the European Union having jurisdiction over processing.

(h) If you wish to exercise any of the rights set out above, please contact **FP FLAG** at trainandplaysports@gmail.com.

Children

FP FLAG takes children's privacy seriously and does not knowingly collect, use, or disclose Personal Data from children other than in connection with the registration with, or provision of, the Services as described below, and **FP FLAG** committed to complying with all applicable laws and requirements, such as the United States Children's Online Privacy Protection Act ("**COPPA**"). **FP FLAG** encourages all parents and guardians to instruct their children in the safe and responsible use of Personal Data on the Internet. **FP FLAG** does not knowingly solicit data from or market to children under the age of 13. The Website is not intended for or directed at children under the age of 13, and **FP FLAG** does not knowingly collect information from children under the age of 13 or knowingly allow such persons to register for Services. If a parent or legal guardian becomes aware that his or her child has provided **FP FLAG** with information without their consent, he or she should contact **FP FLAG** at trainandplaysports@gmail.com. **FP FLAG** will delete such information from its files within a reasonable time.

With respect to **COPPA**, depending on the **FP FLAG** Service, a parent will have the option to do some, if not all, of the following: (i) create an account that includes Personal Data; (ii) register your child online for Services; (iii) receive certain notifications, email or text from other users of the Service; (iv) post photographs or videos of your child; (v) make credit card or ACH payments online; (vi) view balances in accounts; or (vii) print medical release, waivers and other forms as necessary. The Services are available to children under the age of 13 only with parental consent. The Services are intended for parents or adult use until a child reaches the age of 18. Certain Services can be used by children under the age of 13 only with significant parental involvement, oversight and approval.

Children under the age of 13 are not allowed to use Services without a parent's permission. Children under the age of 13 also may not subscribe to, or create their own account with **FP FLAG**. Children may only have an account that is established by, and with the permission of, a Parent.

FP FLAG is required by COPPA to use reasonable efforts to ensure that before we collect any Personal Data from a child, the child's parent receives notice of and consents to our information practices. As a parent, you should know that through the **FP FLAG** Service children under the age of 13 may participate in activities that involve the collection or use of personal information. However, children may not participate in any Website activities without a parent's permission. If your child is under age 13, **FP FLAG** must have "verifiable parental consent" before we collect and use your child's personal information. We do this in two ways: (i) through the parent's registration and payment for their child's participation in a Services; be a member of a team or club; or, subscribe to use one of the Services; and, (ii) by acceptance of registration through the Website or an "email invitation" sent to the parent whereby an account, profile or registration is being created on behalf of the child; or, the child is added to team or club roster; or, the parent confirms the intended purpose to use the Service.

California Privacy Rights

California Civil Code Section § 1798.83 permits users of the Website who are California residents to request certain information regarding **FP FLAG**'s disclosure of their Personal Data to third parties for its direct marketing purposes during the preceding calendar year. To make such a request, please email **FP FLAG** at trainandplaysports@gmail.com.

CAN-SPAM Compliance

FP FLAG has taken the necessary steps to ensure that it is compliant with the Controlling the Assault of Non-Solicited Pornography and Marketing ("CAN-SPAM") Act of 2003 by never sending out misleading information.

Information Update

FP FLAG recognizes that changes can be made to bulletin and message boards and websites regarding website URL's and message board placement. If you would like to update your information in any way, please email **FP FLAG** your updated information to trainandplaysports@gmail.com.

Third Party Links

Occasionally, at **FP FLAG**'s discretion, **FP FLAG** may include or offer third party products or services on its website. These third-party websites, as well as advertisements and messages, linked to the Website by **FP FLAG** are developed, published, and operated by third parties over whom **FP FLAG** exercises no control. Since **FP FLAG** does not control the foregoing, **FP FLAG** encourages you to review the privacy statement posted on any and all third-party websites. **FP FLAG** is not responsible for the privacy statements or practices of websites and services controlled by third parties. Nonetheless, **FP FLAG** seeks to protect the integrity of its website and welcomes any feedback about these websites.

Data Retention

FP FLAG will retain your Personal Data for as long as is necessary for the relevant service or as required by law, or for accounting or regulatory purposes, or as otherwise described in this Privacy Policy.

Data Security

The security of your Personal Data is important to **FP FLAG** but no method of transmission over the Internet or method of electronic storage is 100% secure. While **FP FLAG** strives to use commercially acceptable means to protect your Personal Data, **FP FLAG** cannot guarantee its absolute security.

Your Consent and Changes to the Privacy Policy

FP FLAG reserves the right to change, modify, or update the terms of this Privacy Policy at any time without notice. **FP FLAG** posts the revised Privacy Policy on the Website and indicates the date of the current Privacy Policy above, so you know when it was last updated. If you do not agree to the revised terms and conditions of the Privacy Policy, stop using the Website. Continued use of the Website after any such revision or modification constitutes your acceptance of the Privacy Policy as so revised or modified.

Feedback

If you have questions regarding **FP FLAG**'s Privacy Policy, please email **FP FLAG** at trainandplaysports@gmail.com .

Effective Date: August 1, 2021