

# PRIVACY POLICY

This policy was last modified on December 1, 2022.

This privacy policy (this “**Privacy Policy**”) describes how we collect, use, and share data that we obtain through your use of the Internet sites, applications, email and newsletter communications, and online services (the “**Site**”) operated by, controlled by, or affiliated with xROYALTY, LLC (collectively, “**xROYALTY,**” “**we,**” “**us,**” or “**our**”).

By using the Site, you agree to the practices described in this Privacy Policy and any updates posted here from time to time. To make sure you stay informed of all changes, you should check this Privacy Policy periodically. Updates will be referenced by the “Last Modified” date shown above.

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## Collection of Data

We collect data from you in several different ways on the Site, including personal data and data about your use of the Site which does not identify you personally. Personal data means information, or combination of information, that can reasonably be used to identify you personally (such as your name, phone number, address, and email address).

### **We collect personal data that you voluntarily provide to us.**

We collect personal data that you voluntarily provide to us (such as when you submit an inquiry), including name, email address, and any other data you choose to provide.

### **We automatically collect data about your use of the Site.**

When you access and use the Site, our technology and tools may automatically collect and record certain data about your use of and interaction with the Site that does not identify you

personally (such as your IP address, browser type, the make and model of device used to view the Site, unique device identifiers, the referring webpage, pages visited, and search terms).

We also use various tracking technologies (such as cookies and pixel tags) to collect data about your use of and access to the Site. Cookies are small data files stored on your hard drive or in device memory by websites you visit, applications you use, or advertisements you view and help us improve the Site and your experience on the Site. Pixel tags are electronic images that generate a generic notice of a visit to the Site and are used in conjunction with cookies to anonymously track activity on the Site by a particular browser.

### **Third parties may also automatically collect data about you.**

Some content on the Site may be served by third-party content providers and may also use cookies, pixels tags, or other similar tracking technologies to automatically collect data about you, both on the Site and throughout the Internet. We do not control the technologies of those third parties. Data collection and use by those third parties is subject to the privacy policies of those third parties. It is up to you to review the terms of use and privacy policies of those third parties.

## **Use of Collected Data**

We use the data we collect to assist in the administration and operation of the Site and to provide you an efficient, meaningful, and customized experience.

### **We may use data to:**

- Fulfill our obligations with respect to the reason you voluntarily provided the data (such as responding to an inquiry or provide you with information, products, or services that you request from us or that may be of interest to you);
- Allow you to participate in certain features of the Site;
- Improve the Site or our products, events, and services and for other business or commercial purposes;
- Optimize your experience on the Site (such as troubleshooting technical programs or storing your preferences);
- Provide co-branded services and features (such as contests, sweepstakes, or other promotions);
- Notify you about changes to the Site (including this Privacy Policy);
- Carry out any other purpose described to you at the time the data was collected; and
- Carry out any other purpose with your consent or as permitted by law.

### **Additionally, we may use data for marketing purposes to:**

- Fulfill our obligations with respect to the reason you voluntarily provided the data (such as responding to an inquiry or provide you with information, products, or services that you request from us or that may be of interest to you);

- Develop, improve, and target our promotional messaging to you and others via retargeting, online behavioral advertising, and use of social media platform tools for advertising.
- All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

## Third-Party Websites and Services

Through your use of the Site, you may access, directly or indirectly, other websites or services, including from our service providers, business partners, and other third parties, in each case, that are not owned or controlled by us. Data collection and use by those third parties is subject to the privacy policies of those third parties. It is up to you to review the terms of use and privacy policies of those third parties.

Please note that when you sign up to receive text messages from us, the privacy policy of our conversation platform partner also applies to the submission of your personal information. In addition, you agree to receive recurring text messages (which may be marketing and/or automated) from or on behalf of xROYALTY at the phone number you provided at opt-in. Your consent to receive such text messages is not a condition of purchase. Message and data rates may apply and are billed by and payable to your mobile service provider. Delivery of messages are subject to the effective transmission by your mobile service provider and any policies or terms established by your mobile service provider.

## Sharing of Collected Data

**We may share the data we collect as follows:**

- With our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- With our service providers that perform services for us (such as e-mail and mobile marketing, analytics, and web hosting);
- With our sponsors, promotional partners, or event partners in connection with certain contests, sweepstakes, promotions, or ticketed events;
- With our third-party vendors and partners that sell items, offer promotions, or provide services to you through our services (either alone or jointly with us);
- To comply with a court order or other legal obligation, to enforce the Site terms of use, and to protect the rights, property, or safety of our users and other third parties;
- With government or law enforcement officials or private parties (including our legal or other professional advisors) as we determine, in our sole and absolute discretion, is necessary or appropriate to respond to claims or to comply with legal processes, laws, regulations, or ordinances, or to prevent or stop illegal, unethical, or actionable activity;

- In connection with, or during negotiations of, any merger, acquisition by another company, or sale of all or substantially all of our business or assets; and
- With your consent or at your direction.

## **Transfer of Collected Data**

The Site is operated in the United States. If you are located in another jurisdiction, please be aware that the data we collect will be transferred to, stored, and processed in the United States. By using the Site and/or providing us with any data, you consent to this transfer, processing, and storage of your data in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen such as the European Union. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Notice. We will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards and ensure that your data is treated securely and in accordance with this Privacy Policy.

## **Data Security**

We use commercially reasonable technical and organizational measures to help secure and safeguard your data in our possession. However, no data transmission over the Internet is completely secure and no security mechanism is impenetrable. Therefore, although we take steps to protect your data, we cannot guarantee the security of the data that we collect from you or the security of our servers or the Site. By accessing the Site, any transmission of data is at your own risk and you agree to assume all risk in connection with data sent to us or collected by us.

## **Data Retention**

We retain data only as long as necessary in light of the purpose(s) for which it was originally collected. Please note that we may retain your data for longer periods of time as necessary to comply with our legal obligations or respond to governmental authorities.

## **Children and Parents**

We respect children's privacy. We do not target or knowingly or intentionally collect personal data from children under the age of 18. By using the Site, you have represented and warranted that you are either at least 18 years of age or using the Site with the supervision of a parent or guardian. If you are under the age of 18, you may not use the Site. If you become aware that your child has provided us with personal data without your consent, please [Contact Us].<sup>4</sup>

## **Our "Do Not Track" (DNT) Policy**

Some websites have “do not track” features that allow you to tell a website not to track you. We do not currently respond to those signals or any similar mechanisms transmitted by web browsers. To learn more about DNT and tracking signals, please visit [All About DNT](#).

## Your Data Preferences

### **Cookies, Pixel Tags, and Other Similar Tracking Technologies**

You may remove or reject cookies by adjusting settings on your browser, and thus opt-out of certain features of the Site and the Site’s automatic collection of certain data. These tracking technology opt-out tools are device and browser specific so you must repeat the opt-out from each of your devices and browsers. Please note that removing or rejecting cookies could affect the functionality of the Site.

You may also remove certain tracking technologies and opt-out of online behavioral advertising messaging by using the opt-out tools available from the Digital Advertising Alliance (**DAA Opt-Out Tool**) and the Network Advertising Initiative (**NAI Opt-Out Tools**).

### **Advertising Preferences**

You may adjust your advertising preferences on various social media websites by adjusting your Settings on the particular platform. For example, you may adjust the types of Facebook ads you receive on **Facebook** and the types of Google ads you receive on **Google**.

## Contact Us

If you have any questions about this Privacy Policy, please email us at: [xroyalty@3twarrioracademy.com](mailto:xroyalty@3twarrioracademy.com)