

LAST UPDATED: February 15, 2021

## PRIVACY POLICY

Sportsyard, Inc., the operator of RowanPay (the “Company,” “we,” or “us”) wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through:

- Websites operated by us from which you are accessing this Privacy Policy (the “Websites”);
- Software applications made available by us for use on or through computers and mobile devices (the “Apps”); and
- HTML-formatted email messages that we send to you that link to this Privacy Policy or other communications with you.

Collectively, we refer to the Websites, Apps, emails, and offline business interactions as the “Services.”

### PERSONAL INFORMATION

“Personal Information” is information that identifies you as an individual or relates to an identifiable individual. The Services collect Personal Information, including:

- Identification and online account information, such as name, email address, username and telephone number
- Investment information, including information about tokens that you wish to exchange with other users
- Verification information, such as Social Security number, tax identification number, or any similar number or other government-issued ID
- Information that you provide to us in correspondence;
- IP address (we may also derive your approximate location from your IP address)

### Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services.**
  - *We collect Personal Information through the Services, for example, when you sign up for a newsletter, register an account to access the Services, post a token listing or contact customer service.*
- **From Other Sources.**
  - *We receive your Personal Information from other sources: No other sources.*

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

## Use of Personal Information

We and our service providers use Personal Information for the following purposes:

- **Providing the functionality of the Services and fulfilling your requests.**
  - *To provide the Services' functionality to you, such as arranging access to your registered account, and providing you with related benefits, special promotions, or customer service.*
  - *To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for or other information about our Services.*
  - *To allow you to send messages to another person through the Services, connect you with other users, verify your information, and provide you with related benefits or customer service.*
  - *To send administrative information to you, such as changes to our terms, conditions, and policies.*
- **Providing you with our newsletter and/or other marketing materials and facilitating social sharing.**
  - *To send you marketing related emails, with information about our services, new products and other news about our company.*
- **Analyzing Personal Information for business reporting and providing personalized services.**
  - *To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our Services.*
  - *To better understand your interests and preferences, so that we can personalize our interactions with you and provide you with information tailored to your interests.*
  - *To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.*
- **Aggregating and/or anonymizing Personal Information.**
  - *We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose, as it no longer identifies you or any other individual.*
- **Accomplishing our business purposes.**
  - *For data analysis, for example, to improve the efficiency of our Services;*
  - *For audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements;*
  - *For fraud prevention and fraud security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;*
  - *For developing new products and services;*
  - *For enhancing, improving, repairing, maintaining, or modifying our current products and services, as well as undertaking quality and safety assurance measures;*
  - *For identifying usage trends, for example, understanding which parts of our Services are of most interest to users;*
  - *For determining the effectiveness of our campaigns, so that we can adapt our campaigns to the needs and interests of our users; and*

- *For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.*

## Disclosure of Personal Information

We disclose Personal Information:

- **To our affiliates for the purposes described in this Privacy Policy.**
- **To our third party service providers, to facilitate services they provide to us.**
  - *These can include providers of services such as identity verification, website hosting, data analysis, information technology and related infrastructure provision, customer service or related benefits, email delivery, auditing, and other services.*
- **By using the Services, you may elect to disclose Personal Information to other users.**
  - *Via messages with users and chat, profile pages and other services to which you are able to post information and content. Since the Services are a matchmaking platform, certain information that you post or disclose through these services will be available to other users.*

## Other Uses and Disclosures

We may also use and disclose Personal Information as we believe to be necessary or appropriate: (a) to comply with applicable law, to respond to requests from public and government authorities, to cooperate with law enforcement, or for other legal reasons; (b) to enforce our terms and conditions; and (c) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others.

We may use, disclose or transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our assets or stock (including in connection with any bankruptcy or similar proceedings).

## OTHER INFORMATION

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. The Services collect Other Information such as:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you that does not reveal your specific identity
- Information that has been aggregated in a manner such that it no longer reveals your specific identity

## Collection of Other Information

We and our service providers may collect Other Information in a variety of ways, including:

- **Your browser or device.**

- *Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.*
- **Your use of the App.**
  - *When you download and use the App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.*
- **Cookies.**
  - *Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, and other traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used, and assist us with resolving questions regarding them. We do not currently respond to browser do-not-track signals. If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services.*
- **Pixel tags and other similar technologies.**
  - ***Pixel tags.** Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.*
  - ***Analytics.** We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/), and exercise the opt-out provided by Google by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.*
- **Adobe Flash technology (including Flash Local Shared Objects ("Flash LSOs")) and other similar technologies.**
  - *We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#). You can also go to the [Global Storage Settings Panel](#) and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as "information")), how to prevent Flash LSOs from being placed on your computer*

*without your being asked, and how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.*

- **Physical Location.**
  - *We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device’s physical location to provide you with personalized location-based services and content. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device’s location, but if you do, we may not be able to provide you with the applicable personalized services and content.*

## **Uses and Disclosures of Other Information**

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

## **SECURITY**

We seek to use reasonable organizational, technical and administrative measures designed to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contacting Us*” section below.

## **CHOICES**

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by clicking the email footer link to unsubscribe. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt out.

## **THIRD PARTY SERVICES**

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which the Services link, such as identity verification service providers and third-party token offerors. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, Blackberry, or any other app developer, app provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps.

## USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Information from individuals under 18.

## JURISDICTION AND CROSS-BORDER TRANSFER

The Services are controlled and operated by us from the United States, and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

## SENSITIVE INFORMATION

Unless we request it, we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., social security numbers, financial information) on or through the Services or otherwise to us.

## UPDATES TO THIS PRIVACY POLICY

The “*LAST UPDATED*” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services.

## CONTACTING US

RowanPay, Inc., located at 1455 Frazee Road, Suite 500, San Diego, CA 92108, United States, is the company responsible for collection, use, and disclosure of your Personal Information under this Privacy Policy.

If you have any questions about this Privacy Policy, please contact us at [info@RowanPay.com](mailto:info@RowanPay.com), or:

Sportsyard, Inc.  
ATTN: RowanPay  
1455 Frazee Road  
Suite 500  
San Diego, CA 92108  
United States

Because email communications are not always secure, please do not include credit card or other sensitive information in your emails to us.