

WISDOM GAMING, INC.  
PRIVACY POLICY

Wisdom Gaming, Inc. (“we,” “us,” or “our”) is committed to safeguarding the privacy of our subscribers and their parents or guardians (“you”). The following provides information on how we collect, use, and otherwise processes your personal information during your visit of [www.wisdom.gg](http://www.wisdom.gg), as well as the rights that you have in relation to our processing of that information.

In this Privacy Policy, “personal information” means information that enables you to be personally identified.

If you are a California resident, please click on the << California Privacy Notice>> section for more information.

If you have any comments, questions or requests in connection with this Privacy Policy, please contact us via email at [info@wisdom.gg](mailto:info@wisdom.gg)

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### **Information Collection**

We may collect personal information such as:

- Your name.
- Contact information, such as your phone number, your email address, school name and location.
- Grade and high school graduation date.
- Other personal information provided by school officials.
- Photo.
- User profile.
- Gamer tag.
- Information generated by your use of the services, including, but not limited to, content you post while using our services.
- Cookie and device data, such as information about your visit to our website, IP address, device identifier, browser type and version, operating system and network, location and time zone setting.

### **Information Usage**

We may use your personal information for the following purposes:

- Administration of our subscriber and vendor relationships.
- Enhancing our services through third party game providers.
- Providing public announcements related to services we provide, including, but not limited, to tournaments you participate in.
- Addressing inquiries and feedback.
- Sending you relevant marketing messages via email or SMS.
- Sending you service-related information.
- Improving the functionality and user-friendliness of our website.
- Keeping our website and IT systems and processes safe.
- Complying with legal or regulatory inquiries and requests.

### **Information Sharing**

We may share your personal information with the following categories of recipients:

- Vendors that will process your personal information on our behalf and under our written instructions to carry out their services during the course of our business, such as IT service providers and other cloud-based solutions.
- Third party game providers we use in the course of providing our services.
- Authorized recipients, including, but not limited to, any school official, club administrator, coach, student, parent or legal guardian that has the legal right to receive such information.
- Law enforcement, regulatory, or government agency that requests your personal information in connection with any inquiry, subpoena, court order, or other legal or regulatory procedures with which we would need to comply. We may also share personal information to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.
- We may transfer your personal information to third parties in connection with a reorganization, restructuring, merger, acquisition, or transfer of assets of our firm, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Policy.

#### **Account Changes**

You may request that we update or make corrections to your account information. You may also send us a request to delete your personal information. We may require that you submit information that verifies your identity prior to complying with any request. Requests should be sent to [info@wisdom.gg](mailto:info@wisdom.gg).

#### **Data Storage Location**

Personal information is stored in the United States.

#### **Marketing Choices**

We may send you direct marketing messages including by way of email alerts and mail provided that we have a lawful ground to do so (as explained above). If you no longer wish to receive our email alerts, to be part of a mailing list, or to receive any marketing communications, you can opt-out of such communications at any time by clicking on the unsubscribe link in the relevant communication or contacting us at [info@wisdom.gg](mailto:info@wisdom.gg).

#### **Security**

We endeavor to use and take reasonable steps to protect your personal information, but cannot guarantee the security of any data you disclose online.

#### **Links**

Links to websites that are not operated by or for us, including, but not limited to third party game providers, ("Third Party Sites") are provided solely as a convenience to you. This Privacy Policy does not apply to Third Party Sites. We have not reviewed the Third Party Sites, do not control and are not responsible for their content or their privacy policies, if any. We do not endorse or make any representations about Third Party Sites, or any information, software or other products or materials found there, or any results that may be obtained from using them.

### **Cookies**

The term "cookies" refers to a common method of storing information about your activity on a given website. When you visit our website, our computer system reads the cookie created by your browser to identify whether you are one of our clients and, if so, help you recall preferences you have previously selected.

We also use information stored in cookies to analyze website usage trends, administer the website, track our users' movements around the website, gather demographic information about our user base, and conduct our marketing campaigns.

Most web browsers accept cookies by default, but allow users to reject cookies by changing the browser preferences. If you have set up your browser to reject cookies, some aspects of our website may not work properly for you. Note that this Privacy Policy only covers the use of cookies by us. It does not cover the use of cookies by any Third Party Sites.

### **Do Not Track**

Please note that we do not support "Do Not Track" browser settings at this time.

### **Information Retention**

We will only retain your personal information for as long as necessary for the purposes for which that information was collected as set out in this Privacy Policy, or for longer as required under any applicable legal, regulatory, accounting, or reporting requirements. Should you opt out or no longer wish to receive marketing messages from us, we will securely delete your personal information from the relevant mailing list(s).

### **Children under 13**

A child under the age of 13 is not allowed to subscribe to our service. A parent or guardian must sign up a child that is under the age of 13. We do not knowingly collect personal information from children under the age of 13. If you learn that a child under the age of 13 has provided us with personal information, please contact us at [info@wisdom.gg](mailto:info@wisdom.gg).

### **Notification of Changes**

We reserve the right to change this Privacy Policy at any time. If we make any material changes to this Privacy Policy, we will post the revised version to [www.wisdom.gg](http://www.wisdom.gg) and update the “Effective Date” at the top of this Privacy Policy. Except as otherwise indicated, any changes will become effective when we post the revised Privacy Policy on our website.

**California Privacy Notice**

Updated: January 13, 2021

**Scope**

This California Notice does not apply to you if you are not a California resident.

This California Notice does not apply to you if you are not entitled to a notice under Section 1798.100 of the California Consumer Privacy Act (“CCPA”) because, for example, we collect your personal information while interacting with you in your capacity as an employee, controlling owner, director, officer or contractor of an organization while providing or receiving products or services to or from, or performing due diligence on, that organization.

**Personal information we collect**

The table below identifies what we’ve collected over the last 12 months and what we continue to collect from California residents.

Category	Examples	Processed?
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES/NO
Personal information categories	A name, signature, Social Security number, physical characteristics or description, 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, medical information, or health insurance information.	YES/NO
Protected classification characteristics	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	YES/NO

**Commented [EK1]:** You need to identify the information categories with either yes or no.

Category	Examples	Processed?
	childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES/NO
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES/NO
Internet or similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES/NO
Geolocation data	Physical location or movements.	YES/NO
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	YES/NO
Professional or employment-related information	Current or past job history or performance evaluations.	YES/NO
Inferences drawn from other personal information	Profile a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES/NO

We may also collect other categories of personal information that you choose to share with us.

#### Sources of personal information

We may collect personal information from your interaction with marketing communications, and your participation in events from joint marketing partners and event sponsors when they share this information with us.

#### How we share personal information

We may disclose for business purposes all of the categories of personal information described above with the following categories of third parties:

- *Online services.* If you use our website, or any social media that we operate and/or any services provided through them (collectively, “online services”), we use your general identifiers, online identifiers, internet activity information (as described above) and other information that you submit through the online services for:
  - Hosting and events. If you register for our events, we use your general identifiers, online identifiers, food allergy information and commercial information (as was also described above) to fulfill your registration requests, communicate with you about the event, and to host you at the event. If you visit our offices, we collect your name and organizational affiliation to register and host you.
  - Research and development. We may use your general identifiers, online identifiers, internet activity information and commercial information (as was also described above) for research and development purposes, including to analyze and improve our client services, online services, events and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We render personal information into anonymous data by removing information that makes the data personally identifiable. We may use this anonymous data and share it with third parties for our lawful business purposes.
  
- *Marketing.* We may use your general identifiers, online identifiers, internet activity information and commercial information (as described above) in connection with sending you marketing communications as permitted by law, including by mail and email. You may opt-out of marketing communications by following the unsubscribe instructions in marketing emails or by contacting us at [info@wisdom.gg](mailto:info@wisdom.gg).
- *Compliance and protection.* We may use any of the categories of personal information described above for other purposes consistent with the California Notice or that are explained to you at the time of collection of your personal information.
- *Service providers.* Companies that provide us with services that help us provide services or operate our business, such as IT and software services, mailing services, marketing services, event management services, eDiscovery services, cyber security services and office security services.
- *Government authorities, law enforcement and others.* Government authorities, law enforcement, courts, and others as described in the compliance and protection section above.
- *Transaction participants.* Parties to transactions and potential transactions for the sale, transfer or licensing of a portion or all of our business or assets, including your personal information, such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution.
- *Professional advisors.* Our lawyers, accountants, bankers and other outside professional advisors in the course of the services they provide to us.
- We may also share personal information with other categories of third parties with your consent or as described to you at the time of collection of your personal information.

California law permits California residents to request Information regarding:

- Categories of personal information (as this is defined by applicable California law) collected, sold or disclosed by us;
- Purposes for which categories of personal information collected by us are used;
- Sources of information from which we collect personal information; and
- Specific pieces of personal information we have collected about you.

In addition, California residents may:

- Opt-out of the sale or disclosure of personal information in some circumstances;
- Opt-out of receiving marketing communications from us (you may still receive administrative communications regarding our services);
- Opt-in to certain financial incentive programs we may offer related to the collection, sale, or deletion of your personal information; and
- Request deletion of your personal information by us and our service providers, in some circumstances.

#### Information Requests

You can direct requests related to your California personal information by emailing [info@wisdom.gg](mailto:info@wisdom.gg)

Please be aware that we do not accept or process requests through other means (e.g., via fax, social media, email addresses, etc.).

We will review the information you provided with your request and may ask you for additional information to ensure we are interacting with the correct individual. Please also be aware that making any such request does not ensure complete or comprehensive removal or deletion of personal information or content you may have posted, and there may be circumstances in which the law does not require or allow us to fulfill your request.