EVEN PLAYGROUND | LEGAL

Global Privacy Notice

How Even Playground collects, uses, shares, protects and retains personal information across South Africa, the EU/EEA, the UK, the United States, Canada, Asia-Pacific and every other region where the platform is used.

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Issued by Even Playground (Pty) Ltd (Reg. 2022/584666/07)

Summary at a glance

We collect the information needed to run sports administration, athlete profiles, verified records, media and communications for schools, clubs, academies, federations, parents, athletes, coaches, officials and media contributors.

- We **never sell** identifiable personal information, and we never sell or rent children's information.
- Children's profiles are **private by default** and are controlled by a parent, guardian or authorised institution.
- We rely on consent only where consent is genuinely the right legal basis. Other processing rests on contract, legal obligation or legitimate interests, and we tell you which applies (section 6).
- Aggregated and de-identified statistics that no longer identify anyone belong to Even Playground (section 10).
- Every time a legal document changes, you will be asked to accept the new version before your next sensitive action. Each acceptance is stored as a new, time-stamped record; earlier records are kept for audit (section 18).
- You can withdraw consent and exercise your privacy rights at any time, free of charge (sections 15 and 18).

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1. Who we are and what this notice covers

Even Playground is operated by Even Playground (Pty) Ltd, registration number 2022/584666/07, with its registered address at 191 Leeuwpoort Street, Boksburg, Gauteng, 1459, South Africa ("Even Playground", "we", "us", "our"). This notice applies to our websites, web and mobile applications, athlete profiles, dashboards, media services and related communications (together, the "Platform"), wherever in the world you access them.

For most personal information on the Platform, Even Playground is the **responsible party** (POPIA) or **controller** (GDPR and similar laws). Where a school, club, academy, university or federation (an "Institution") uses the Platform to manage its own learners, members or athletes, that Institution is the responsible party or controller for its own records, and we process those records on its behalf as its **operator** or **processor** under a written agreement. In that case, the Institution's own privacy notice also applies and requests about those records may be passed to the Institution.

This notice should be read with our South African POPIA Data Processing Notice (legal.popia_notice), our Terms of Service (legal.terms_version) and our Indemnity and Limitation of Liability Agreement (legal.indemnity_version).

In plain terms: *Even Playground runs the Platform and is responsible for your data. When your school or club runs its own records through us, the school or club is responsible for those records and we follow its instructions.*

2. Contact our Privacy and Legal Team

Purpose of your request	Channel
Privacy, data protection and data subject rights (all countries)	support@evenplayground.com (subject: "Privacy request") - or in-app: Profile > Privacy & Data > Make a request
Information Officer (South Africa - POPIA and PAIA)	Ukho Handula, Information Officer - support@evenplayground.com
Deputy Information Officer	Tshegofatso Chochi, Deputy Information Officer - support@evenplayground.com
Legal notices, terms and indemnity queries, institutional contracts	support@evenplayground.com (subject: "Legal notice")
Security incidents and vulnerability reports	support@evenplayground.com (subject: "Security - urgent")
EU representative (GDPR Art. 27) and UK representative (UK GDPR Art. 27)	Not yet appointed. Until an EU and a UK representative are appointed and named in a new version of this document, EU/EEA and UK data subjects and supervisory authorities may contact our Information Officer directly at support@evenplayground.com (subject line: "GDPR request"), and every such request is handled under the GDPR or UK GDPR.
Postal and registered address	Even Playground (Pty) Ltd, 191 Leeuwpoort Street, Boksburg, Gauteng, 1459, South Africa

These contact details are kept up to date on our Legal page at https://evenplayground.com/legal. If the website differs from this document, the website is current and prevails. Please tell us which country you live in so that we apply the right law to your request.

In plain terms: *Email the privacy address or use the in-app request form. We answer requests from every country.*

3. Information we collect

Category	Examples
Account and identity	Name, surname, username, email, mobile number, password (stored only as a secure hash), profile type and role, profile picture, date of birth or age group, gender where collected, province or region, preferred language, account status.
Athlete and sporting record	School, club, academy, university or federation affiliation; sport, position or event; jersey number; athlete ID; team history and transfers; fixtures; participation and attendance; results, rankings, statistics, achievements, awards and certificates.
Performance and development	Match statistics, race times, fitness and training metrics, coach and official assessments, performance notes and video analysis. Health-related, injury, biometric or wearable data is only collected under section 4.
Media	Photographs, video, livestreams and highlights of fixtures and events; tags linking media to athlete profiles; captions and comments.
Parent, guardian and relationship	Details of parents and guardians, their relationship to a minor athlete, and the authority they hold over the minor's profile.
Institutional	Staff and coach names and roles, rosters, fixtures, consent registers and administrative records uploaded by Institutions.
Transactions	Subscriptions, invoices, media contributor fees and wallet ledger entries. Card details are handled by our payment provider; we do not store full card numbers.
Technical and usage	IP address, device and browser identifiers, operating system, log files, session and access timestamps, cookies and similar technologies, approximate location derived from IP.
Consent and legal records	Which document versions you accepted or declined, when, from which device and IP address, and any withdrawals of consent.
Communications and support	Messages, support tickets, complaints, survey responses and privacy requests.

Sources. We collect information directly from you; from parents and guardians; from Institutions and their staff; from coaches, referees, officials and event organisers; from media contributors who photograph or film fixtures; from publicly available results published by sporting bodies; from our service providers (for example, payment

confirmations); and automatically from your devices.

In plain terms: *We collect what is needed to run your sporting profile and your team's administration, plus basic technical data. Some of it comes from your school, club or coach rather than from you.*

4. Sensitive and special personal information

Some laws give extra protection to categories such as health, biometric information, race or ethnic origin, religious beliefs and criminal behaviour ("special personal information" under POPIA, "special category data" under GDPR, "sensitive personal information" under CPRA). The core Platform is not designed to collect these. We will only process health, injury, biometric or wearable-derived data if a specific feature needs it, and then only with your separate, explicit consent (or that of a parent or guardian for a minor), or where another legal authorisation applies. We do not use facial recognition to identify athletes in media without separate explicit consent.

In plain terms: *We don't collect health or biometric data unless you switch on a feature that needs it and agree separately.*

5. Children and young athletes

Young athletes are central to the Platform, so we apply stricter rules to children's information:

- A **child** means anyone under 18 in South Africa, or the age set by local law elsewhere. In the EU/EEA and UK, we require parental consent below the digital age of consent in the child's country (between 13 and 16). In the United States, we do not knowingly collect personal information from children under 13 without verifiable parental consent as required by the Children's Online Privacy Protection Act (COPPA).
- A child's profile may only be created by a parent, legal guardian or other competent person, or by an Institution that confirms it holds the required parental consent. The competent person gives or refuses consent on the child's behalf.
- Children's profiles are **private by default**. Public visibility, discovery by scouts and promotional use of a child's image require a separate opt-in by the parent or guardian, which can be withdrawn at any time.
- We do not sell children's information, do not target advertising at children, and do not use children's information for profiling that produces legal or similarly significant effects.
- When an athlete turns 18 (or the local age of majority), the profile moves into a transition state and the athlete is asked to review and accept the current documents personally. Parental authority over the profile then ends, except where the athlete chooses to keep a parent linked.
- If we learn that we hold a child's information without the required consent, we will delete it or obtain the consent promptly.

Reporting a safety concern

Anyone can report content or behaviour that may put a child at risk using the Report button on any profile, media item or message, or by emailing support@evenplayground.com with the subject line "Child safety - urgent". We prioritise these reports, may restrict accounts while we investigate, and will refer matters to the relevant Institution, parent or guardian, or the authorities where the law requires or a child's safety demands it.

In plain terms: *Parents and guardians are in control of children's profiles. Children's profiles start private and are never sold.*

6. Why we use your information and our legal basis

We only use personal information for specific purposes. We do not treat consent as the answer to everything: where we rely on a different legal basis, the table tells you.

Purpose	Information used	Legal basis
Create and secure accounts; manage roles and permissions	Account, technical	Contract; legitimate interests (security)
Run athlete profiles, fixtures, attendance, results and statistics	Athlete, performance, institutional	Contract; for children, consent of a competent person

Purpose	Information used	Legal basis
Verify records and maintain data integrity	Athlete, institutional, media tags	Legitimate interests (a trustworthy verified record)
Host and tag media; notify athletes and parents of tagged media	Media, account	Consent (for minors, parental consent); contract
Public profiles and scout discovery	Selected athlete and performance data	Consent (opt-in)
Service messages (fixtures, results, security, account)	Account, contact	Contract; legitimate interests
Marketing and partner offers	Contact, preferences	Consent, or existing-customer exception where the law allows
Billing, contributor payments and fraud prevention	Transactions, account	Contract; legal obligation; legitimate interests
Analytics, product improvement and aggregated insights	Usage, de-identified sporting data	Legitimate interests
Legal compliance, audits, disputes and law enforcement requests	Any relevant category	Legal obligation; legitimate interests
Health, injury, biometric or wearable features	Special personal information	Explicit consent

Where we rely on legitimate interests, we have balanced our interests against yours, and you may object (section 15).

In plain terms: *Each use of your data has a stated reason. Anything optional - public profiles, marketing, media of children, health data - needs your opt-in.*

7. Verified records and accuracy

Information on the Platform can be submitted, imported, generated or corrected by different authorised people. Each record displays one of these statuses:

Status	Meaning
Unverified	Submitted by a user and not yet confirmed by an authorised source.
Submitted	Evidence provided and awaiting review.
Verified	Confirmed by an authorised coach, official or Institution.
Official	Confirmed by an Institution, federation or event authority.
System-generated	Calculated by Even Playground from underlying records (for example, averages or rankings).

Even Playground does not guarantee the accuracy of information supplied by third parties. You can ask for inaccurate information to be corrected (section 15). To protect the integrity of the verified record, a verified or official result may only be changed through the correction process, and we may keep a record that a correction was made.

In plain terms: *Records carry a label showing who confirmed them. We fix mistakes when asked, and we keep a trail of the changes.*

8. Who can see your information

Visibility is controlled by role and by the privacy setting on each profile: **Private** (the athlete and the linked parent or guardian), **Institution** (adds authorised staff and coaches of linked Institutions), **Verified network** (adds vetted scouts, federations and universities), and **Public**. Children's profiles default to Private. Contact details, date of birth, home address, documents and parent details are never shown publicly. Authorised Even Playground personnel may access accounts for support, security, verification, legal and compliance purposes under internal controls; every such access is logged.

Scouts, universities and the verified network

Scouts, recruiters, universities and federations may only join the Verified network after we check their identity and organisation, and they must accept conduct rules that prohibit direct contact with a child except through the parent or guardian or the child's Institution. They can only see profiles whose owners (or, for a child, whose parent or guardian) have opted in to discovery. Their searches and profile views are logged, and access can be withdrawn at any time for misuse.

Administrator access and audit logging

Even Playground staff may access accounts only for a defined purpose - support you asked for, security, verification, fraud prevention, legal compliance or investigating a report - and only with the lowest level of access needed. Any "view as user" session and any change made by staff is recorded in an audit log that shows who acted, when, what changed and why. Audit logs are reviewed regularly and kept for 5 years.

In plain terms: *You choose who sees your profile. Scouts only see opted-in profiles, and every staff access is logged.*

9. Who we share information with

- **Service providers (operators/processors)** - hosting and database infrastructure, email and SMS delivery, payments, video storage and streaming, analytics, customer support and AI tools - under written contracts that limit their use of the data to our instructions and require security safeguards. A current list is available on request from support@evenplayground.com.
- **Institutions** you or your child are linked to, and federations or event organisers running competitions you take part in.
- **Media contributors**, only to the extent needed to tag and deliver media.
- **Other users**, according to your visibility settings.
- **Professional advisers**, auditors and insurers under confidentiality duties.
- **Authorities**, where required by law or to protect the safety of a child or any person.
- **A successor business**, if Even Playground is involved in a merger, acquisition, financing or sale of assets. The successor must honour this notice for information already collected, and we will notify you of any change of control.

No sale. We do not sell identifiable personal information and do not "share" it for cross-context behavioural advertising as those terms are defined in the California Consumer Privacy Act (CCPA/CPRA).

The media contributor programme

Local and student photographers and videographers ("media contributors") may cover fixtures and upload media. Contributors tag athletes; a tag becomes "verified" only after an athlete, parent, guardian or Institution confirms it. Tagged athletes (or, for a child, the parent or guardian) are notified and may view, claim, download, hide or ask us to remove the media. To view or claim media, a free account is required. Media of a child is not shown publicly unless the parent or guardian has opted in. Contributors are paid through a wallet ledger that records their uploads and verified tags; they receive only the information needed to tag and are bound by our Media Contributor Terms.

In plain terms: *We share data with the companies that help us run the Platform, with your teams and competitions, and with authorities when the law requires it. We don't sell your data.*

10. Aggregated and de-identified data

We may combine and de-identify information so that it no longer identifies, and cannot reasonably be used to re-identify, any individual. De-identified and aggregated data, together with the statistics, benchmarks, models, rankings methodologies and insights derived from it, are owned by Even Playground. We may use and commercialise them, including for research, benchmarking, talent-development insights, product development and reports for partners and sponsors. We will not attempt to re-identify such data, and we contractually prohibit anyone who receives it from doing so. De-identified data is not personal information and may be kept after your account is closed.

In plain terms: *Statistics that no longer identify anyone belong to Even Playground and can be used to improve sport and our services.*

11. International transfers

We and our service providers may store or process information outside the country where you live, including outside South Africa, the EU/EEA and the UK. Before transferring, we make sure a lawful transfer mechanism applies: the recipient is subject to law, binding corporate rules or a binding agreement providing an adequate level of protection (POPIA section 72); an adequacy decision; the European Commission's Standard Contractual Clauses; the UK International Data Transfer Agreement or Addendum; or your consent where the law allows. Where POPIA requires the Information Regulator's prior authorisation (for example, for certain transfers of children's information), we will obtain it before transferring.

In plain terms: *Your data may be hosted abroad, but only with legal safeguards in place.*

12. How long we keep information

Information	Retention period
Account data	While the account is active, plus 12 months after closure
Verified and official sporting results	While the account is active. After closure, kept only in de-identified or limited historical form (event, result, date) for historical, statistical and research purposes, with safeguards
Media	Until removed by the uploader or on a valid request, plus up to 90 days in backups
Consent and legal acceptance records	For the life of the account plus 5 years, as audit evidence
Financial, invoice and contributor wallet records	7 years, as required by company and tax law
Security and access logs	12 months; audit logs of privileged access 5 years
Marketing preferences	Until withdrawal, plus 2 years as evidence of the opt-out
Support and privacy requests	3 years after closure of the request
Children's records	Reviewed when the athlete turns 18 and on closure; deleted or de-identified unless the adult athlete keeps the profile

We may keep information longer where the law requires it, to establish or defend legal claims, or while a dispute or investigation is ongoing. After retention ends, we delete, destroy or de-identify the information.

In plain terms: *We keep data only as long as we need it, then delete it or strip out anything identifying.*

13. How we protect information

We use administrative, technical and physical safeguards appropriate to the risk, including encryption in transit (TLS 1.2 or higher) and at rest (AES-256), role-based access control, multi-factor authentication for privileged users, audit logging, monitoring and staff confidentiality obligations. No system is completely secure, and we cannot guarantee that information will never be accessed without authorisation. You are responsible for keeping your login credentials confidential.

In plain terms: *We protect your data with strong security, but no online service can promise perfect security.*

14. Security incidents

If we have reasonable grounds to believe personal information has been accessed or acquired by an unauthorised person, we will notify the relevant regulators and affected people as required by law - including the Information Regulator and affected data subjects as soon as reasonably possible under POPIA section 22, and the competent EU or UK supervisory authority within 72 hours where the GDPR or UK GDPR requires it.

15. Your rights

Depending on where you live, you have some or all of the following rights. They are available free of charge, subject to the fees the law permits for certain access requests.

- **Access** - confirm whether we hold your information and receive a copy.

- **Correction** - correct inaccurate, incomplete or outdated information.
- **Deletion** - ask us to delete information we no longer need or have no legal basis to keep.
- **Restriction and objection** - object to processing based on legitimate interests, and to direct marketing at any time.
- **Portability** - receive information you gave us in a structured, machine-readable format.
- **Withdraw consent** - at any time, without affecting processing that happened before withdrawal.
- **Human review** - not to be subject to decisions based solely on automated processing that significantly affect you.
- **Opt out of sale or sharing and limit sensitive information use** (California) - we do not sell or share, and we use sensitive information only for permitted purposes.
- **Non-discrimination** - we will not treat you differently for exercising your rights.
- **Complain** to your data protection authority (section 19).

How to exercise your rights. Use Profile > Privacy & Data in the app, or email support@evenplayground.com. Parents and guardians may make requests for their child. You may use an authorised agent where the law allows. We will verify your identity before acting and respond within 30 days, or sooner where local law requires (one month under the GDPR; 45 days under the CCPA, extendable where permitted). Some rights have legal limits - for example, we may keep information needed to meet legal obligations, resolve disputes, prevent fraud or preserve the integrity of verified records - and we will explain if a limit applies.

In plain terms: *You can see, fix, download or delete your data and switch off marketing at any time, from the app or by email.*

16. Analytics, rankings and automated processing

The Platform calculates statistics, averages, rankings and performance summaries from underlying records. Future features may include AI-assisted video analysis and performance predictions. These outputs are tools to support human judgement, not decisions: we do not make decisions with legal or similarly significant effects about you solely by automated means. Predictions and potential ratings are estimates, are labelled as such, and do not guarantee selection, scholarships, recruitment or any sporting outcome. You can ask for human review of any output that concerns you.

17. Marketing, cookies and similar technologies

We keep **service messages** (for example, fixture updates, verification notices and security alerts) separate from **marketing**. We send marketing only with your opt-in consent, or to existing customers about similar services where the law allows, and every marketing message includes a free opt-out. We do not send marketing to children without a parent's or guardian's consent.

We use strictly necessary cookies to run and secure the Platform. Analytics, preference and marketing cookies are used only with your consent where the law requires it, and you can change your choice at any time through the cookie settings link in the website footer.

18. Consent, version control and re-consent

This section explains exactly how our consent system works.

- **How you give consent.** Consent is only given by a clear affirmative action, such as ticking an unticked box next to the named document and version. Simply visiting or logging in to the Platform is never treated as consent. Required acknowledgements (Terms of Service, this notice, the POPIA Notice, the Indemnity Agreement) are separate from optional consents (marketing, public profile, scout discovery, media and promotional use of images, special personal information), and you can use the core service without giving any optional consent.
- **What we record.** Each acceptance creates a new consent record containing your user ID, the document type and version, the consent type, the date and time (timestamp), your IP address and device information, and the screen or action where you consented.

- **Version changes.** Each legal document has its own version number. When we publish a new version of any legal document, your acceptance of the earlier version no longer covers the new one. You will be asked to review and accept the new version before your next **sensitive action**, which includes: making a payment or subscription change; submitting or uploading personal information; updating your profile; creating or linking a child's profile; uploading or tagging photos or video; changing profile visibility; exporting data; or connecting a new Institution or device.
- **New timestamp, history kept.** When you accept a new version, we record a **new** consent timestamp. Earlier consent records are never overwritten or deleted during the retention period in section 12; they are kept as an audit trail showing what you agreed to and when.
- **If you decline.** You can still view your existing information and exercise your privacy rights, but sensitive actions will stay unavailable until you accept the current version.

YOUR RIGHT TO WITHDRAW CONSENT

You may withdraw your consent at any time. You can withdraw any consent you have given - including marketing, public profile, scout discovery, media use and special personal information consents - in Profile > Privacy & Data, or by emailing support@evenplayground.com. Withdrawal is free and takes effect for future processing. It does not make processing carried out before the withdrawal unlawful. If processing is necessary to provide the core service, withdrawing may mean we can no longer provide that part of the service, and we will tell you before this happens. Where we rely on a legal basis other than consent, we may continue processing on that basis, and you may object to it.

19. Regional supplements

These supplements apply automatically based on where you live. Where a supplement gives you stronger rights than the rest of this notice, the supplement applies.

Region	Additional terms and regulator
South Africa	Our POPIA Data Processing Notice (legal.popia_notice) applies in full. Regulator: Information Regulator, Woodmead North Office Park, 54 Maxwell Drive, Woodmead, Johannesburg, 2191; enquiries@inforegulator.org.za; complaints: POPIAComplaints@inforegulator.org.za.
EU/EEA and UK	Controller: Even Playground (Pty) Ltd. EU and UK representatives: not yet appointed - until they are, contact our Information Officer at support@evenplayground.com with the subject line 'GDPR request'. Legal bases are set out in section 6. You may complain to the supervisory authority where you live or work, or in the UK to the Information Commissioner's Office (ICO).
United States (California and other states)	In the past 12 months we collected the categories in section 3 from the sources listed there, for the purposes in section 6, and disclosed them for business purposes to the recipients in section 9. We do not sell or share personal information, and have no actual knowledge of selling or sharing information of consumers under 16. Sensitive personal information is used only for purposes permitted by law. Residents of other states with privacy laws (for example Colorado, Connecticut, Virginia, Texas) have equivalent rights and may appeal a refusal by replying to our decision.
Canada	We comply with PIPEDA and applicable provincial laws, including Quebec's Law 25. Our privacy officer is reachable at support@evenplayground.com. You may complain to the Office of the Privacy Commissioner of Canada or your provincial commissioner.
Asia-Pacific	We comply with applicable laws including the Australian Privacy Act and Australian Privacy Principles (OAIC), Singapore's PDPA (our data protection officer: support@evenplayground.com), Japan's APPI (PPC), and India's Digital Personal Data Protection Act 2023 (grievance officer: support@evenplayground.com; you may approach the Data Protection Board of India after using our grievance process). The Platform is not directed at users in mainland China.
Other regions	Where other data protection laws apply (for example Nigeria's NDPA, Kenya's Data Protection Act or Brazil's LGPD), we honour the rights they grant and you may contact your local authority.

20. Changes to this notice

We may update this notice to reflect changes to the Platform, our practices or the law. Each update is published at https://evenplayground.com/legal with a new version number and effective date, and triggers the re-consent process

in section 18. Where the law requires, we will also notify you by email or in-app message before the change takes effect.

Appendix A - Consent wording used on the Platform

The Platform shows the following wording, with the current version number filled in automatically. Required items must be ticked to create an account; optional items are unticked by default and can be changed at any time.

Type	Wording shown beside the checkbox
Required	I have read and agree to the Even Playground Terms of Service (v[x]) and the Indemnity and Limitation of Liability Agreement (v[x]), including the clauses that limit Even Playground's liability and require me to indemnify it.
Required	I have read the Global Privacy Notice (v[x]) and, if I am in South Africa, the POPIA Data Processing Notice (v[x]), and I understand how my personal information will be used.
Required - parent or guardian	I am the parent, legal guardian or other competent person for this child, and I consent to Even Playground processing the child's personal information as described in the Global Privacy Notice (v[x]).
Optional	Send me news, offers and partner opportunities from Even Playground. I can unsubscribe at any time.
Optional	Make this profile visible in the Verified network so that vetted scouts, universities and federations can discover it.
Optional	Allow photos and video of me (or my child) to be shown publicly and used to promote Even Playground.
Optional - feature specific	I explicitly consent to Even Playground processing my (or my child's) health, injury or wearable data for the feature I am switching on.

Each item is recorded separately with its own timestamp, as described in section 18.

Document control and version history

Version	Effective date	Summary of change	Re-consent required
1.0	23 September 2026	First global release, replacing all earlier privacy wording.	Yes - all users, before their next sensitive action

The version of this document is stored in the platform configuration key **legal.privacy_version**. Any change to this document, however small, is published under a new version number, and publishing a new version triggers the re-consent workflow described in this document.