

## Privacy Policy

Last updated: February 7, 2022

Welcome to SportsNet Inc. ("SportsNet"). Please read this Privacy Policy carefully, as it governs our collection, use, sharing, and protection of personally identifiable information ("Personal Data") when providing our Service.

## Interpretation and Definitions

### Interpretation

The words of which the initial letter is capitalized have meanings under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

### Definitions

For the purposes of this Privacy Policy:

**Account** means a unique account created for You to access our Service or parts of our Service.

**Customers** refer to schools and school districts with paid Subscriptions to our Service.

**Device** means any device that can access the Service (such as a computer, cell phone or digital tablet).

**Parents** refer to parents or legal guardians of current or former students attending a School subscribing to our Service.

**Personal Data** refers to any representation of information that permits the identity of an individual to whom the information applies to be reasonably inferred by either direct or indirect means.

**Schools** refer to schools and school districts with paid Subscriptions to our Service.

**Service** refers to features made available to You via <https://sportsnetinc.com> and <https://sportsnethost.com>, including all related subdomains and services.

**SportsNet** (referred to as "SportsNet", "We", "Us" or "Our") refers to SportsNet Inc., 200 Industrial Road, Suite 155, San Carlos, CA 94070.

**Student Data** refers to any information that is directly related to any identifiable current or former student that is maintained by a school or school district.

**Subprocessors** refer to our third party service providers who perform technology services on our behalf and are subject to strict confidentiality and data security requirements.

**Subscriptions** refer to access to the Service on a subscription basis to schools and school districts.

**Users** refer to individuals with Accounts on our Service.

**You** means the individual accessing or using the Service, or the school, school district, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

## **Personal Data**

Schools and school districts (“Schools”) use our Service to collect Personal Data about individuals, including but not limited to students, parents, legal guardians, and school staff. We process this Personal Data on behalf of Schools and we do not use it for any purpose other than providing the Service. We provide the Service in compliance with all applicable federal, state, and local privacy laws, rules, and regulations.

Schools retain exclusive ownership of the Personal Data they collect through use of our Service, and we store their Personal Data in a separate database from other Customers. This applies to information about Users, Student Data, and any other Personal Data a School collects through use of our Service.

SportsNet does not access Personal Data owned by the School without permission from the School. When we do access this information, we do so only to the extent necessary to provide technical support. We never sell Personal Data collected through use of our Service and do not share it with any third party except as follows:

- We share information with Subprocessors assisting us in providing certain features and functionality of the Service (for example, web hosting, email notifications, and payment processing), but strictly for the purpose of carrying out their work for us. SportsNet enters into written agreements with all Subprocessors requiring them to protect Personal Data in a manner no less stringent than as described in this Privacy Policy.
- We will disclose any information we have collected where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

We will retain Personal Data belonging to Schools only for as long as is necessary to fulfill our obligations in providing the Service to them. Upon termination of our contract with a School, we will securely transfer all Personal Data to the applicable school and remove it from our servers (see “Termination” in our [Terms and Conditions](#)).

## **User Information**

SportsNet provides each School with a dedicated, password-protected web address through which authenticated Users can sign into the Service. User Accounts can be created via self-registration or by a School official with administrative permissions. As per our [Terms and Conditions](#), Accounts may not be created for individuals under the age of 18.

**Information collected about Users:** Schools use the Service to collect the first name, last name, email address, and password for each User when his or her Account is created. When a User uses the Service, we automatically collect the IP address of the User's Device, the pages of our Service the User visits, and the date and time of the User's visit. When a User adds, deletes, or updates a record within our Service, we collect information enabling us to associate the User's Account with the modification of the record as well as the date and time. We also collect information related to any payments a User makes to the School through use of our Service (see "Payment Transaction Information" below).

**Use of User information:** A User's name may be used within the Service in identifying the individual's activity related to records he or she has viewed, created, updated, or deleted. This information may be visible to authorized Users as determined by the School. A User's email address serves as the individual's username when signing into the Service. We use User email addresses to send Service-related notifications on behalf of the School such as:

- Confirmation emails following registration or payments
- Payment requests
- Messages related to athlete or coach clearance
- Instructions for activating an account or resetting a User's password

We do not use information collected about Users through use of the Service for any marketing purpose.

## **Student Data**

One type of Personal Data of particular concern to SportsNet and to Schools using our Service is Student Data. This section specifically addresses Student Data and how our Service enables Schools to remain compliant with applicable federal, state, and local privacy laws, rules, and regulations.

Student Data shared with SportsNet will not be used for any purpose other than providing the Service. SportsNet will never sell Student Data to any third party and will never use Student Data for any marketing purpose. All Student Data stored on and accessed through our Service is the exclusive property of the applicable School using our Service. We provide the Service in compliance with all applicable federal, state, and local privacy laws, rules, and regulations, all as may be amended from time to time.

SportsNet requires all employees and agents who have access to Student Data to comply with all provisions of this Privacy Policy. SportsNet requires and maintains an appropriate confidentiality agreement from each employee or agent with access to Student Data.

SportsNet will not disclose Student Data other than as directed or permitted by the School. This prohibition does not apply to Student Data disclosed pursuant to a lawfully issued subpoena or other legal process, or to Subprocessors performing services on behalf of SportsNet (see “Sharing of Student Data” below).

**Student Data we collect:** The Student Data we collect depends on how a School uses the Service. Schools using the Service for online registration for sports will typically ask parents to provide student ID numbers, first and last names, gender, date of birth, enrollment history, sport selections, emergency contacts, health information, and electronic signatures for various policies and agreements. Schools may also ask parents to upload documents through our Service, including but not limited to pre-participation physical examination forms. Schools may also use the Service to upload academic performance information to be used in determining eligibility for participation, such as grade point averages and credits earned.

**How Student Data is Collected:** Student Data is collected when a School, parent, legal guardian, or student above the age of 18 provides it through use of the Service. Schools enter Student Data through a secure, password-protected website hosted by us or via a secure file transfer to one of our servers. Parents, legal guardians, and students above the age of 18 enter Student Data during the online registration process through a secure, password-protected website hosted by us.

**Ownership of Student Data:** We collect Student Data on behalf of Schools using our Service (“Customers”). Student Data is the exclusive property of the Customer for whom it was collected.

**Control of Student Data:** Schools using our Service retain control over all Student Data, including which users can view, add, delete, and modify records. SportsNet provides training, documentation, and ongoing support for administrative users who are responsible for managing access to Student Data.

**Sharing of Student Data:** Our Service enables Schools to securely share Student Data within the Service itself. SportsNet employees do not access Student Data without the consent of the School to whom it belongs, and only as necessary to provide technical support. We may share information with Subprocessors assisting us in providing certain features and functionality of the Service (for example, web hosting, email notifications, and payment processing), but strictly for the purpose of carrying out their work for us. SportsNet enters into written agreements

with all Subprocessors requiring them to protect Student Data in a manner no less stringent than as described in this Privacy Policy. Subprocessors may not access or share Student Data in any manner inconsistent with this Privacy Policy.

**Procedures for reviewing Student Data and correcting erroneous information:** Parents and legal guardians (“Parents”) may sign into their Account to review information they have previously submitted to the School. If any information they have submitted has changed or is incorrect, the erroneous information can be corrected by the Parent from inside our secure, password-protected registration website. If a Parent contacts us to review Student Data or correct erroneous information, we will refer them to the School for assistance. SportsNet will provide technical support to the School upon request to facilitate the sharing and/or modification of Student Data stored within the Service.

**Security of Student Data:** The security of Student Data depends on both SportsNet and the School using our Service. SportsNet provides training, documentation, and ongoing support for administrative users who are responsible for managing access to Student Data. SportsNet employees do not access Student Data without the consent of the School to whom it belongs, and only as necessary to provide technical support. Access to our network is restricted to password-protected Devices within our locked corporate office using host-based firewalls and industry-standard RSA key pairs.

**Procedures in the Event of Unauthorized Disclosure:** In the event of an unauthorized disclosure of Student Data, we will do the following within 24 hours:

- We will notify the affected Customer to describe in detail the nature of the breach, the actions we have taken, and the steps and timeline for resolution.
- If warranted, the breach will be reported to local law enforcement.
- In conjunction with the district, we will notify affected users, explain the impact of the breach, and our plan and timeline for resolution. The Customer may choose to notify affected users independently.

**Removal of Student Data upon Termination:** Upon written request from the School, SportsNet will dispose of or provide a mechanism for the School to transfer Student Data obtained through the School’s use of the Service. Upon termination or non-renewal of the School’s subscription, if no written request from the School is received, SportsNet will dispose of all Student Data after providing the School with reasonable prior notice (see “Termination” in our [Terms and Conditions](#)).

## **Payment Transaction Information**

SportsNet uses Stripe to facilitate secure card payments to Schools from Users of our Service or other visitors to one of our websites. Stripe and SportsNet Inc. are separate entities, and our

Schools will need to complete an onboarding process with Stripe to ensure PCI DSS compliance. Please note that Schools will be subject to the [Stripe Connected Account Agreement](#) and the [Stripe Privacy Policy](#).

Payment method information is collected securely by Stripe and at no time is stored on any of SportsNet's servers. We use the Stripe Connect API ("Stripe Connect") to facilitate online card payments and to deposit funds into a School's bank account. Schools have access to payment transaction information we collect on their behalf, such as the name and email address of the cardholder, the payment amount, and the name of any student and/or team associated with the payment. This information is made available to Schools through use of our Service and through their own Stripe accounts.

## **Cookies**

Cookies are small files that are placed on Your Device by a website. We use essential cookies to help authenticate Users and prevent fraudulent use of user accounts. These cookies are deleted as soon as You close Your web browser and are only used so that You can access our Service. We do not use cookies for any other purpose in providing our Service.

Most browsers will allow You to disable cookies. Please note that You will not be able to access the parts of our Service requiring User authentication if You disable cookies.

## **Security**

We maintain strict administrative and technical procedures to protect information stored on our servers, which are located in the United States. We use industry-standard encryption technology to safeguard all data transferred over the Internet while using our service, as well as while data is at rest on our servers. Below is a brief overview of some of our more important security measures.

- We use TLS 1.2 for encrypting all data sent to and from our servers over the web.
- We use the 256-bit Advanced Encryption Standard (AES-256) algorithm to encrypt all data stored on our servers.
- Our server instances leverage the Amazon Web Services (AWS) secure cloud services platform. AWS is widely recognized for its world-class security, dependability, and scalability.
- Data stored on our servers is backed up multiple times per day and in multiple geographical locations (all in the United States).
- We use host-based firewalls and industry-standard RSA key pairs to control access to our network.
- User passwords stored on our servers are protected using best practice encryption methods (cryptographic hash functions and salting).

## **Changes to the Privacy Policy**

We may need to change this Privacy Policy to reflect changes in law or best practice or to address new features we introduce. We will notify Our Customers via email at least 30 days before changes take effect, and our websites will contain links to the latest version.

By accessing or using the Service after changes to this Privacy Policy take effect, You agree to be bound by the updated Privacy Policy.

## **Contact Us**

If you have questions about this Privacy Policy, please contact us at [support@sportsnetinc.com](mailto:support@sportsnetinc.com).