

# Privacy Policy

## 1. Introduction

1.1 InPlay Innovation (“InPlay Innovation, we, us”) recognizes that people who use InPlay Innovation’s Service (“you” or “users”) value their privacy. This Privacy Policy details important information regarding the collection, use and disclosure of User information collected on InPlay Innovation’s fantasy sports website located at hotstreak.gg (the "Site"), the related mobile app, and any other features, tools, materials, or other services (including co-branded or affiliated services) offered from time to time by InPlay Innovation or its affiliate companies (the “Service”). InPlay Innovation provides this Privacy Policy to help you make an informed decision about whether to use or continue using the Service.

1.2 This Privacy Policy should be read in conjunction with our [Terms of Use](#). By accessing the Service, you are consenting to the information collection and use practices described in this Privacy Policy.

1.3 Your use of the Service and any information you provide through the Service remains subject to the terms of this Privacy Policy and our Terms of Use, as each may be updated from time to time.

1.4 Any questions, comments or complaints that you might have should be emailed to [privacy@InPlayInnovation.com](mailto:privacy@InPlayInnovation.com) or forwarded in writing to:

InPlay Innovation Inc  
312 Arizona Ave  
Santa Monica, CA 90041

## 2. Information We Collect

By using our Service and by submitting information to us through your use of our Service then this Privacy Policy will apply. You provide certain personal information to InPlay Innovation when choosing to participate in the various activities on the Service such as registering for an account, participating in contests, posting messages, taking advantage of promotions, responding to surveys or subscribing to newsletters or other mailing lists. The personal information we collect from you generally may include:

2.1.1 your name;

2.1.2 email address;

2.1.3 date of birth;

2.1.4 PayPal or credit card billing information;

2.1.5 contacts you choose to submit;

2.1.6 profile photo;

2.1.7 username;

2.1.8 location;

2.1.9 your preferences;

2.1.10 submissions to various competitions and promotions;

2.1.11 responses to surveys;

2.1.12 communications sent to us by you;

2.1.13 your subscriptions to newsletters and services offered by us; and

2.1.14 any other information you submit to InPlay Innovation when choosing to participate in various activities on the Service.

2.2 In addition to the above, we may need to verify your identity in order for you to use some aspects of the Service. For purposes of verification, we may also collect the following personal information from you (for compliance reasons, provision of this information, when requested, is a mandatory condition of using our Service):

2.2.1 passport information;

2.2.2 driving license information;

2.2.3 other identification documents;

2.2.4 permanent and temporary address;

2.2.5 tax-related information; and

2.2.6 other information as may be required to verify you in accordance with applicable laws and regulations.

2.3 When you use our mobile app, we also may collect mobile device information like operating system and hardware type, numbers or codes that are unique to your particular device (such as IDFA or an Android Ad ID), device information, default device

language, the location of your device (at a GPS level), and app usage information. This data also may be linked to your other information, including your location data.

2.4 In addition, if you choose to log in, access or otherwise connect to InPlay Innovation, or contact InPlay Innovation, through a social networking service (such as Facebook), we may collect your user ID and user name associated with that social networking service, as well as any information you make public using that social networking service. We may also collect information you have authorized the social networking service to share with us (such as your user ID, public profile information, email address, birthday, friends list, and pages you have "liked").

2.5 Cookies Information: When you visit the InPlay Innovation.com or Hotstreak.gg websites, we may send one or more cookies - small files - to your computer or other device, which may enable us or others to uniquely identify your browser. InPlay Innovation uses both session cookies and persistent cookies. A persistent cookie remains after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the site. Persistent cookies can be removed by following your web browser help file directions. Session cookies are temporary and typically disappear after you close your browser. You may be able to reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Site or Service may not function properly if the ability to accept cookies is disabled.

2.6 Log File Information: When you use our Service, our servers may automatically record certain information that your device sends whenever you visit any website and use certain apps. These server logs may include information such as your web or app request, Internet Protocol ("IP") address, browser type, browser language, referring/exit pages and URLs, platform type, number of clicks, domain names, landing pages, pages viewed and the order of those pages, the amount of time spent on particular pages, the date and time of your request, and one or more cookies that may uniquely identify your browser.

2.7 Clear GIFs Information: When you use our Service, we may employ technology such as "clear GIFs" (a.k.a. Web Beacons) which are used to track the online usage patterns of our users. In addition, we may also use clear GIFs in HTML-based emails sent to our users to track which emails are opened by specific users.

2.8 InPlay Innovation may also collect information about you from third parties, such as marketing partners, identity verification services, anti-fraud services and other service providers.

### 3. The Way InPlay Innovation Uses Your Personal Information

3.1 We use your personal information to operate, maintain, and provide to you the features and functionality of the Service, including but not limited to the following:

3.1.1 providing you with our products and services, including our games;

3.1.2 processing and responding to enquiries;

3.1.3 personalizing your use of the Service,

3.1.4 alerting you to new features, special events, products and services, or certain third-party products or services in which we think you will be interested;

3.1.5 enforcing the legal terms that govern your use of the Service; and

3.1.6 investigating and protecting the integrity of InPlay Innovation's contests.

3.2 We may use your information (both personal and non-personal information) to send you marketing and advertising content, including sending you advertising through multiple channels, such as direct mail, email, push notifications and display media. We may send you advertising or content regarding our products and services, or products and services that we market on behalf of another company, such as a sports team, a sports venue, or other entity.

3.3 We may use your information to communicate with you about:

3.3.1 our products and services in which you may be interested provided that you have not requested otherwise;

3.3.2 newsletters and information for which you have signed up; and

3.3.3 non-marketing or administrative purposes (such as notifying you of major changes to the Service or for customer service purposes).

3.3 We use your information to improve the quality and design of our Service and to create new features, promotions, functionality, and services such as by storing, tracking, and analyzing user preferences and trends.

3.4 We also use cookies, clear gifs, log file information, and mobile app information such as device identifiers for purposes such as (a) remembering information so that you will not have to re-enter it during your visit or the next time you visit our Service; (b) providing custom, personalized content and information; (c) monitoring the effectiveness of our marketing campaigns; (d) monitoring aggregate metrics such as total number of visitors, pages viewed, etc.; and (e) tracking your entries, submissions, and status in promotions, sweepstakes, and contests. You can learn more about how these technologies are used in the Section below, Third Party Advertising and Analytics.

3.5 We may anonymize, de-identify, or aggregate your information for any legitimate business purposes, including for reporting and research, or advertising. Such anonymized and/or aggregated data does not personally identify you. Sometimes, this information may be used to target more relevant content or offers to you across different

devices – for instance, we may provide you with offers and content on your mobile device, based on your web-based activity.

3.6 We will retain personal information as long as necessary to fulfill these purposes unless the law requires us to keep it for a longer period of time. To provide security and business continuity for the activities described here, we make backups of certain data, which we may retain for longer than the original data.

## 4. When InPlay Innovation Discloses Information

4.1 We may disclose the information we collect or receive from you to our subsidiaries, affiliated companies, agents, or other businesses, or service providers who process your information on our behalf in order to provide or operate the Service. For instance, these entities may have access to your information for purposes including (but not limited to) billing and accounting, hosting, marketing, promotional and email services, customer and technical support, and for the purpose of accepting deposits and paying withdrawals and processing such information on our behalf, and in each case, may use the information to make improvements to the services they provide to us. Our agreements with these service providers limit the kinds of information they can use or process and require them to use reasonable efforts to keep your personal information secure.

4.2 When you choose to share information with social media services about your activities on InPlay Innovation by, for example, connecting your social media account to our Service, then InPlay Innovation may share your personal information and information about your use of the Service with such social media sites. Please make sure to read the terms and privacy statements of such sites prior to connecting to our Service in this way.

4.3 In the event that you win a prize we may use your personal information (such as your name and photo) in connection with publicity purposes.

4.4 In the event that you win a promotion run by us we may be required to either publish or make available upon request your name and county in accordance with applicable legislation.

4.5 We may publish a profile page that includes your username, the date you became a member, your stats from previous contests and, if you uploaded one, your profile picture. Where you post personal information about yourself through our Service to public areas of our Service, you acknowledge and agree that this personal information will be publicly available.

4.6 When you participate in a contest, we may publish your username on a list of the contest participants, along with a link to your profile page.

4.7 Where you have provided your consent, we may share your personal information with selected third parties for their commercial or marketing use in conjunction with your relationship with InPlay Innovation or as part of a specific program or feature.

4.8 In addition, we may disclose to third parties various types of your information for targeted online or mobile advertising, as further described in the Section titled “Third Party Advertising and Analytics.”

4.9 We also may share personal information in other situations with your consent.

4.10 InPlay Innovation also reserves the right to disclose personal information that InPlay Innovation believes, in good faith, is appropriate or necessary to enforce our Terms of Use, take precautions against liability or harm, to investigate and respond to third-party claims or allegations, to respond to court orders or official requests, to comply with state and federal regulations, including but not limited to sharing with appropriate tax authorities, to protect the security or integrity of our Service, to report violations of InPlay Innovation’s eligibility rules to third parties, including employers of individuals affiliated with other daily fantasy sites, and to protect the rights, property, or safety of InPlay Innovation, our users or others.

4.11 In the event that InPlay Innovation is involved in a merger, acquisition, sale, bankruptcy, insolvency, reorganization, receivership, assignment for the benefit of creditors, or the application of laws or equitable principles affecting creditors' rights generally, or other change of control, there may be a disclosure of your personal information to another entity related to such event.

4.12 Recipients of the data disclosures described in this Privacy Policy are located in the United States and elsewhere in the world, including where privacy laws may not provide as much protection as your country.

## 5. Legal Bases for Processing Personal Data

5.1 Some laws require companies to tell you about the legal grounds they rely on to process your personal information. To the extent those laws apply, we process your personal information:

5.1.1 Legitimate interests: In many cases, we handle personal data on the ground that it furthers our legitimate interests’ in commercial activities such as the following in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:

- (a) Customer service
- (b) Marketing
- (c) Protecting our players, personnel and property

(d) Analyzing and improving our business

(e) Processing job applications

(f) Managing legal issues

5.1.2 We may also process personal data for the legitimate interests of our affiliates or business partners, such as to offer special events or contests or assist with marketing.

5.1.3 Processing for the contract: Some of our processing of personal data is to meet our contractual obligations with our players.

5.1.4 Consent: Where required by law, and in some other cases, we handle personal data on the basis of your implied or express consent.

5.1.5 Legal compliance: We need to use and disclose personal data in certain ways to comply with our legal obligations.

## 6. Your Choices

6.1 InPlay Innovation will process your personal information in accordance with this Privacy Policy, and as part of that InPlay Innovation provides you with certain choices about how we process your personal information. These choices are set out below.

6.2 You can access and update certain personal information InPlay Innovation holds about you at any time by logging into your account via the app.

6.3 We may occasionally send display media to you, in a targeted way, whether through web or mobile browsers or mobile applications. You may opt out of many third parties that support and send this type of targeting advertising by going to [www.aboutads.info](http://www.aboutads.info), and you may learn more about this type of advertising in the below Section titled “Third Party Advertising and Analytics.” You may opt out of tracking for mobile advertising through the settings on most smartphones, and you may learn more about these settings through those mobile device platforms, i.e., Google ([here](#)) and Apple ([here](#)). (Please note that these companies may change either the way these settings operate, the content or the availability of these pages.)

6.4 We may send you push notifications to your mobile device. You can turn off certain push notifications in the account settings of your InPlay Innovation mobile app. You can also turn off push notifications specific to our Service in the settings on your iOS device, or through the application manager in your Android device.

6.5 You can reach us as described below with any other concerns, requests or complaints regarding our data collection, data use or data transfer. You also have a right to file a privacy complaint with the relevant privacy regulator, but we respectfully

invite you to allow us to try to resolve the matter directly. We will attempt to answer your questions and satisfy your concerns in a timely and complete manner.

## 7. Advertising And Analytics

7.1 We work with a number of companies that assist in marketing our services to you on third party websites. These companies may collect information about online activities conducted on a particular computer, browser or device over time and across third-party websites or online services for the purpose of delivering advertising that is likely to be of greater interest to you, including about our Services, on sites and apps of third parties.

Also, certain ads appearing on our Service are delivered by our advertising partners. Our advertising partners may use cookies and other similar technologies, often in conjunction with unique (anonymous) cookie identifiers, to collect data about your activities and interests, including the technologies described above. Some of these partners may use mobile device identifiers, such as Apple IDFA's and Google/Android Advertising IDs. Doing this allows the ad companies to recognize your computer or device each time they send you an online or mobile advertisement. In this way, the ad companies may compile information about where you, or others who are using your computer or device, saw their advertisements and measure your interaction with each ad. This information allows ad companies to deliver targeted advertisements that may be of increased interest to you, both on our Service and elsewhere online. Just as these technologies may be used to target ads on our websites and apps, we, or our advertising partners, may use these same technologies and data points (e.g., mobile identifiers, cookie identifiers, location-based data), through our Service or through other services, to target advertising (for ourselves or other companies) on other sites or mobile apps. Sometimes, these identifiers may be derived from a hashed or encrypted version of personal information such as your email address. We may use this information to measure the performance of our advertising as well, for instance, to evaluate which ads or content our users prefer, or which are most effective. In addition, sometimes we or an advertising partner may tailor advertising to you across different devices.

7.2 To learn more and to opt out of the collection of data on our website by third parties (including those described above) for interest-based advertising purposes, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices) or [www.youronlinechoices.com](http://www.youronlinechoices.com). Note that because this opt out method may be cookie-based, you will need to opt out again if you update or change your browser, or delete your cookies. You can also control interest-based advertising on apps on your mobile device with the AppChoices app, available for iOS and Android. Note that opting out will not affect the quantity of ads you see online but likely will cause the ads to be less relevant to you.

7.3 We also that we also work with third-party analytics companies to collect data on our Service through cookies and other automated means. In some cases, the third parties mentioned in this section may maintain the information they collect in personally identifiable form. These services allow us to view a variety of reports about how visitors interact with the Services so we can improve our website and understand how people find and navigate it.

## 8. Information Security

8.1 We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure.

8.2 Whilst neither we, nor any other organization, can guarantee the security of information processed online, we do have appropriate security measures in place to protect your personal information. For example, we store the personal information you provide on computer systems with limited access that are located in facilities to which access is limited.

8.3 To further protect your privacy and security, we reserve the right to take reasonable steps (such as requesting your password) to verify your identity before granting you profile access or making corrections.

8.4 Additionally, you should ensure your password is kept secret at all times. You will be responsible for maintaining the secrecy of your password and account information.

## 9. State-Specific Privacy Rights

9.1 Shine the Light Disclosures. If you reside in California, you may request certain general information regarding our disclosure of personal information during the preceding year to third parties for their direct marketing purposes. To make such a request, please write to us at the following address:

InPlay Innovation Inc  
312 Arizona Ave  
Santa Monica, CA 90041

9.2 California Consumer Privacy Act. If you are a California resident, California law requires us to provide you with some additional information regarding how we collect, use, and share your “personal information” (as defined in the California Consumer Privacy Act (“CCPA”)).

**Categories of personal information we collect.** Throughout this Privacy Policy, we discuss in detail the specific pieces of personal information we collect from and about users. Under the CCPA, we are also required to provide you with the “categories” of personal information we collect. The categories we may collect are: identifiers (such as name, address, email address, driver’s license); commercial information (such as deposit or contest entry data); financial data (such as payment information); internet or other network or device activity (such as browsing history or Services usage); geolocation information (e.g., your city and state based on IP address); professional or employment related data (e.g., as part of your profile); audio information (e.g., if you participate in a customer support call and do not opt out of call recording); in certain circumstances, information used to manage potential fraud or legal risk (such as

employment status and criminal history); inference data about you; and other information that identifies or can be reasonably associated with you.

**How we use and disclose these categories of personal information.** We use and disclose the categories of personal information we collect from and about you consistent with the various business purposes we discuss throughout this Policy, and how you engage with the Service. Please see the relevant section(s) above for more information.

### 9.3 Your California Privacy Rights

CCPA Rights Disclosure. If you are a California resident, the CCPA allows you to make certain requests about your personal information. Specifically, the CCPA allows you to request:

- ! Information about the categories of personal information we collect or disclose about you; the categories of sources of such information; the business or commercial purpose for collecting your personal information; and the categories of third parties with whom we share/disclose personal information. Such information is also set forth in this Privacy Policy.
- ! Provide access to and/or a copy of certain information we hold about you.
- ! Delete certain information we have about you.
- ! Provide you with information about the financial incentives that we offer to you, if any.

The CCPA further provides you with the right to not be discriminated against (as provided for in applicable law) for exercising your rights.

We will consider all requests and provide our response within the time period stated by applicable law. Please note, however, that certain information may be exempt from such requests in some circumstances, which may include if we need to keep processing your information or to comply with a legal obligation. We will let you know where this is the case or if certain rights don't apply in your country or state of residence. We also will take reasonable steps to verify your identity before responding to a request, which might include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, verifying your name, email address, and date of birth. You are also permitted to designate an authorized agent to submit certain requests on your behalf. In order for an authorized agent to be verified, you must provide the authorized agent with signed, written permission to make such request or a power of attorney. We may also follow up with you to verify your identity before processing the authorized agent's request.

Additionally, exercising your deletion right may mean that you may no longer be able to use the Service.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, **please contact us at [privacy@inplayinnovation.com](mailto:privacy@inplayinnovation.com)**

### 9.4 Notice of Right to Opt Out of Sale of Personal Information

California residents may opt out of the “sale” of their personal information. California law broadly defines “sale” in a way that includes when we share your information with third parties, such as sports leagues or teams, to provide you with offers and promotions that we believe may be of interest to you. It also may include allowing third parties to receive certain information, such as cookies IP address and/ or browsing behavior, to deliver targeted advertising on the Services or other services. Advertising, including targeted advertising, enables us to provide you certain content for free and allows us to provide you offers relevant to you.

Depending on what Services you use, we may provide the following categories of information to third parties for these purposes:

- ! For online targeted advertising purposes: demographic and statistical information, user-generated content, device information and identifiers, connection and usage data, geolocation, and social media information.

- ! For sharing with third parties to send you relevant offers and promotions: contact and account registration information; demographic and statistical information, user-generated content, and geolocation.

If you would like to opt out of our use of your information for such purposes that are considered a “sale” under California law, you may do so by submitting a sale opt-out request by emailing us at [support@inplayinnovation.com](mailto:support@inplayinnovation.com). Please note that we do not knowingly sell the personal information of minors under 16 years of age without legally-required affirmative authorization.

## 10. Changes and updates

10.1 This Privacy Policy may be revised periodically and this will be reflected by the "Last update posted" date above. Please revisit this page to stay aware of any changes. If a revision to this Privacy Policy, in our sole discretion, is material, we will notify you by contacting you through the email address associated with your account.

10.2 Contact Information: Please contact InPlay Innovation with any questions or comments about this Privacy Policy by emailing [privacy@inplayinnovation.com](mailto:privacy@inplayinnovation.com).