

ProhiBet Privacy Policy for BYU

This Privacy Policy ("Policy") describes the data protection practices of Secure Sports Solutions, LLC d/b/a ProhiBet ("ProhiBet" "we" "us"). We are committed to protecting the privacy of information collected and ensuring the confidentiality and security of all data collected. This Policy outlines how ProhiBet collects, uses, and safeguards personal information shared with ProhiBet in accordance with applicable privacy laws in order to create a safe and secure method to facilitate data transfer between stakeholders in the sports betting ecosystem regarding prohibited sports betting participants and any other related services (collectively, the "Services").

Information We Collect

In order to provide the Services mentioned herein, ProhiBet partners with United States based sports betting operators ("Operators") and United States professional sports leagues ("Leagues") (collectively, the "Partners"). Partners will have access to their own private servers hosted by ProhiBet. Operators are responsible for uploading lists of persons for which wagers were accepted while Leagues are responsible for uploading lists of prohibited sports betting participants. The information uploaded by the Partners pertaining to prohibited sports betting participants and persons for which wagers were accepted may contain personally identifiable information such as names, address, date of birth, or other identifiers associated with prohibited sports betting participants. The Partners are responsible for uploading their lists to the ProhiBet platform located within the Partner's servers and the ProhiBet platform will then fully encrypt the list and transmit the encrypted hashes. ProhiBet will not decrypt the files uploaded by the Partners to ProhiBet's platform, unless a Partner provides ProhiBet with its encryption keys and then in such instance only with respect to the Partner's information. ProhiBet's proprietary technology is fully capable of performing the Services contained herein while simultaneously keeping the uploaded files encrypted.

Purpose of Collection

The ProhiBet platform uses the uploaded encrypted files provided by the Partners for the sole purpose of identifying potential matches of prohibited sports betting participants who have created sports betting accounts or otherwise placed wagers on an Operator's platform. We do not use the encrypted files for any other purpose, and we do not share or disclose the contents of the encrypted files to any third parties, except as required by law or to comply with legal obligations. ProhiBet, in order to enhance the Services contained herein, is capable of collecting certain statistical information from the lists provided by the Partners, including, but not limited to, how many individuals are included on the lists provided. ProhiBet is capable of, and warrants to, collecting the necessary statistical information while simultaneously keeping the files fully encrypted.

Data Security

ProhiBet takes the security of the data collected through the performance of Services extremely seriously. We implement reasonable and appropriate security measures to protect against unauthorized access, loss, theft, and alteration of the encrypted files and any other data we transfer, collect and store. These measures may include, but are not limited to, encryption, firewalls, access controls, and regular security

audits. However, no security system is impenetrable. Accordingly, we do not guarantee the security of our databases, nor that information supplied by the Partners won't be intercepted while being transmitted to us over the Internet or other any network. Any information transmitted to ProhiBet is done at the Partners own risk. We will make any legally required disclosures of any breach of the security, confidentiality, or integrity of any electronically stored "personal data" (as defined in applicable state statutes on security breach notification) to Partners via email or conspicuous posting through the ProhiBet platform in the most expedient time possible and without unreasonable delay, as consistent with (i) the legitimate needs of law enforcement or (ii) any measures necessary to determine the scope of the breach and restore the reasonable integrity of the data system.

Data Retention

ProhiBet will retain the encrypted files uploaded by Operators and Leagues and any other data collected through the performance of Services for as long as necessary to fulfill the purposes of Services, unless otherwise required by law or to comply with legal obligations. ProhiBet shall promptly inform the Operators or Leagues in the event ProhiBet is required by law to remove any data uploaded by the Partners from the ProhiBet server.

International Transfer

By accessing and using ProhiBet, the Partners acknowledge and agree that ProhiBet controls and operates all parts of ProhiBet from its offices in the United States. Unless expressly stated to the contrary, ProhiBet makes no representation that ProhiBet is appropriate for or will be available for use in other locations. If Partners access the ProhiBet platform from outside the United States, Partners acknowledge and agree that their information may be transferred to and maintained on computers and servers located outside of their respective states, provinces, countries, or other governmental jurisdictions where the privacy laws may not be as protective as those in their jurisdiction. Partners' consent to the Policy followed by the submission of their respective data represents an agreement to the transfer of such information to the United States and the collection, use, and disclosure of their information in accordance with United States law and our Privacy Policy.

User Rights

The Partners have the right to access their respective encrypted files for the purposes of correcting or removing information previously uploaded. The Partners will be provided with instructions on how to properly access their respective files and make any necessary changes.

Cookies and Tracking Technologies

ProhiBet does not use cookies or any other tracking technologies on our website or within the ProhiBet platform.

Third-Party Services

ProhiBet may use third-party service providers to assist with the operation of Services such as hosting, data storage, and analytics. These service providers may have access to the encrypted files uploaded by the Partners. Such access shall be granted only to the extent necessary to perform their services for us. Under no circumstances shall any third-party service provider assisting with the operation of the Services

contained herein be able to decrypt the files uploaded by the Partners. Any third-party service providers used for the Services contained herein are contractually obligated to maintain the confidentiality and the appropriate level of security.

Updates to Policy

ProhiBet reserves the right to amend this Policy at any time by adding new terms or by deleting and or amending existing terms. Such modifications will be effective as of the date the updated terms are posted on ProhiBet's platform. Partners' continued access and use of the ProhiBet platform constitutes their acknowledgment of such modifications and their agreement to abide, and be bound, by the Policy as modified. Partners must cease their use of ProhiBet if they do not accept such modification(s).

Contact Information

Please feel free to contact ProhiBet with any questions you may have regarding this Policy. We may be contacted at legal@prohibet.com.

For more information about BYU Privacy, go to privacy.byu.edu.

Last updated: 05/01/2023