

PRIVACY POLICY

The Sports Industry Credit Association (SICA-US) is committed to respecting your privacy and complying with applicable data protection and privacy laws. This Privacy Policy ("Policy") is designed to help you to understand what kind of information we collect about you in connection with our products, promotions, and services and how we process and use such information.

By using our site, signing up for email, using our other products or services, entering promotions, participating in surveys, becoming a member, or otherwise providing information to us, you are expressing your consent to and your awareness and acceptance of the practices described in this Policy or other terms, agreements, or policies (see OTHER APPLICABLE TERMS, below).

SCOPE OF THIS POLICY

This Policy applies to personally identifiable information or data, ("Personal Information") that we collect when you sign up to receive email, visit any of our websites (collectively, the "site"), or use or access our other products or services. It also applies to Personal Information we collect when you otherwise interact with us, such as when you make a payment, place an order, sign up for an activity, or contact customer service. This Policy also applies to Personal Information that we may receive from our partners and third-party sources.

PERSONAL INFORMATION

Personal Information under this Policy is personal information or data that we may collect and which we directly associate with a specific person such as the person's name, address, phone or fax number, email address, account information (e.g., member account, credit card information and online registration), online activities or other specific Personal Information. Because of the broad range of services and product offerings, we may collect other very specific Personal Information. For example, we may collect age or date and year of birth. Our definition of Personal Information does not include *aggregate* Personal Information. Aggregate information is information that we collect about a group or category of services or people that does not contain any Personal Information or from which we or our agents remove any Personal Information.

COLLECTION OF PERSONAL INFORMATION

We are the sole owners of the information collected on this site, except as otherwise provided in this Policy. We collect Personal Information about you in the normal course of our business when you use our services or otherwise interact with us. Various ways in which we may obtain Personal Information from you are described below.

Personal Information You Provide

We may collect Personal Information that varies with your membership, interests, and activities, and what you chose to provide to us. We collect Personal Information when you sign up for, purchase, or use our products or services, when you sign up to receive emails, or when you email, call or otherwise communicate with us. We also collect Personal Information when you call or email our customer service

representatives, or when you contact us about your membership. In some cases, the Personal Information we ask you to provide will be mandatory for purposes of participating in a particular activity or service. If you do not provide this Personal Information, your participation may be limited or prohibited.

Personal Information Collected Automatically

Whenever you use our services we receive certain types of Personal Information automatically. For example, when your web browser accesses our site, we obtain certain types of Personal Information, such as your IP address, country of origin, the type of browser you use, and the page you visited before visiting our site.

Personal Information from Third Parties

We may receive Personal Information about you from third parties. For example, we may receive creditworthiness or other financial Personal Information from members. We may also purchase certain Personal Information from others to better inform you about our products, services, and offers that we think will interest you as well as to better inform our members. This Policy applies to Personal Information we obtain from third parties as well as to any Personal Information that we add to or combine with Personal Information otherwise covered by this Policy.

USE OF PERSONAL INFORMATION

SICA-US uses Personal Information, and/or any additional service specific information, for the purposes described in this Policy. Please note that one or more purposes may apply simultaneously and that the examples below are not intended to be a definitive list of every lawful use we might make of Personal Information, but are only general descriptions and illustrations.

Provision of Products and Services

We may use your Personal Information to fulfill your requests, process your order or as otherwise may be necessary to perform or enforce any contract between you and SICA-US to identify you and to prevent and investigate fraud and other misuses.

Development of Products and Services

We may use your Personal Information to develop our products and/or services. However, for the most part we only use aggregate and statistical information in the development of our products and services. We may also use your Personal Information to personalize our offering and to provide you with service more relevant to you, for example, to make recommendations and to display customized content and advertising in our websites. We may combine Personal Information collected in connection with your use of a particular SICA-US product and/or service with other Personal Information we may hold about you. We may create aggregate statistical information based in part on your Personal Information.

Communications and Marketing

We may use your Personal Information to communicate with you, for example, to provide information relating to our products and/or services you are using or to contact you for customer satisfaction queries. We may use your Personal Information for marketing or research purposes, for example, to conduct market research and we may, in accordance with applicable law, contact you to inform you of new

products, services or promotions we may offer. Also, some of our products and services may be used to promote products and services of other companies. However, SICA-US does not disclose your Personal Information to such companies or any other company for marketing purposes without your consent.

DISCLOSURE OF PERSONAL INFORMATION

We do to not sell, lease, rent or otherwise disclose Personal Information to third parties except as otherwise stated below.

Consent

If you provide us with Personal Information, we may disclose that Personal Information to third parties with your consent. We may obtain consent from you in several ways, such as in a form or agreement; online, through "click-through" agreements or registration pages; verbally, through interactive voice response; or when your consent is part of the terms and conditions through which we provide you a particular product or service, offer opportunities to enter contests or promotions, or request your participation in surveys.

Implicit Consent

Your consent is sometimes implicit in situations where it goes without saying and is manifest. For example, if you purchase a product from a store or through our site and ask that it be shipped to your home or other address, you implicitly consent to our disclosure of your name and address to a third-party shipping company to complete delivery, of your credit card number to the credit card processor to authorize the transaction, and to the bank to collect payment.

Product or Service Fulfillment

We may disclose Personal Information to third parties who complete transactions or perform services on our behalf, or who complete transfers related to providing products or services to you. For example, we may contract with third parties, who are often service providers, to host a site, collect and provide products reviews, or send our emails. Through contracts with these third parties, we restrict the manner in which they may use and disclose Personal Information about you without your consent, consistent with this Policy.

Corporate Business Transactions

Personal information may be disclosed as part of a corporate business transaction, such as a merger or acquisition, joint venture, corporate reorganization, financing or sale of company assets. It may also be disclosed in the event of insolvency, bankruptcy or receivership in which Personal Information could be transferred to third parties as one of the business assets in the transaction.

Legal Process

We may disclose Personal Information to comply with the law (e.g., a lawful subpoena); to enforce or apply any contracts or agreements; to initiate, render, bill, and collect for products or services; to protect our rights or property; in connection with claims, disputes, or litigation; to protect ourselves, our

members, and other customers from the harmful acts of others (e.g., theft, fraud, or abuse); or if we determine disclosure of Personal Information is necessary in an emergency.

MINORS

You may provide or we may ask for Personal Information about children. We do not, however, want to collect Personal Information from children. Do not provide us any Personal Information (directly or on site bulletin boards, etc.) unless you are at least 16 years of age. We encourage parents to caution their children not to provide any Personal Information. If a child under 16 has provided Personal Information, a parent or guardian may so inform us by writing us at the address noted below, and we will use commercially reasonable efforts to delete it from our database, subject to applicable law and this Policy.

SECURITY

SICA-US takes reasonable technical and organizational information security measures to help prevent and minimize such risks associated with providing Personal Information.

Such measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights management systems and processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your Personal Information against unauthorized use or disclosure. Where appropriate, we may also take back-up copies and use other such means to prevent accidental damage or destruction to your Personal Information. If a particular part of a SICA-US website supports on-line transactions, we, or our affiliates will use security measures, such as the one available through Secure Sockets Layer (SSL), to protect the confidentiality and security of online transactions.

However, security breaches and mistakes can and do happen and we do not and cannot guarantee the security of Personal Information. Except for financial transmissions, you should assume the site is not encrypted. Email communications and online chat are not encrypted, so do not include sensitive Personal Information in them. "Phishing," imposters, and fake websites are, unfortunately, a fact of modern life.

USE OF LOCATION DATA

When you are accessing this website on a mobile device, we may ask to determine your current location in order to provide you with the most accurate data. We do not share your location information with any third parties. You may disable the use of location services in the application settings at any time.

WHAT YOU CAN DO TO PROTECT PERSONAL INFORMATION

At any time, if you believe Personal Information about you within our control has been accessed by unauthorized persons, please contact us in writing at the address in this Policy. An important part of ensuring the security of Personal Information is your own effort to protect it against unauthorized access or use.

ACCESS TO AND CONTROL OVER PERSONAL INFORMATION

We do not maintain all Personal Information in a form that can be accessed or updated by you and some items may not be changed (e.g., transaction records). Accordingly, we will determine what may be accessed and how; we may also keep a record of changes (including deletions) and disclose them for lawful purposes. We keep Personal Information for as long as we think is necessary or advisable and we reserve the right to retain it to the full extent not prohibited by law. We may discard Personal Information at our discretion, so you should retain your own records. Often, it is not feasible or advisable to discard Personal Information (such as commingled Personal Information), so we reserve the right to retain it but treat it as inactive or discarded. You may make a request for us to update, change, or correct Personal Information (that is eligible for updating, changing, or correction) by contacting our Customer Service department via email, telephone, or mail (see <https://www.sicaweb.org/contactus.aspx?locale=en-us> and click the appropriate links for redirection to appropriate country and contact information).

OPT-OUT CHOICES

Email

If you provide Personal Information, we may contact you via email to tell you about promotions, new products or services, issues regarding your purchases, changes to this Policy, or to respond to an inquiry you have made. You may opt out of future contacts from us at any time by using the method provided in the email (such as clicking on a link), or contacting us via the email address, mail, or phone number provided in this Policy.

COOKIES, WEB BEACONS, AND SIMILAR TECHNOLOGIES

We use "cookies" or other tracking mechanisms to help support the integrity of registration and usage processes on our site, to retain changes that you made (e.g., if you personalize a page), and to learn about your possible interest so that we can try to personalize marketing. A "cookie" is a small data file that our site transfers to your computer for storage to allow our server to "remember" specific Personal Information. We also use cookies or similar information for typical business purposes such as to administer the site, to track and analyze visitor traffic so that we can adjust the site, and to advertise and promote our products and services. The cookies or other tracking mechanisms collect at least the following: your domain name and host for Internet access; the Internet address of the site from which you came; the date and time of your access; and your computer's IP address and information about its operating system and browser. These technologies help us to combat fraud or misuse and to remember things like: (1) the profile facts you tell us about yourself, (2) your specified areas of interest on our sites, and (3) the pages you visit. You can disable some cookies, but the site won't necessarily function as designed if you do (e.g., cookies must be enabled to register and log-on, for example).

We also allow collection by analytic service provider(s) of site click-stream and cookie data to help us track aggregate and individual use of our site and determine possible interests of users.

Some advertisers might use their cookies on our site or in their messages to you. If you click on an advertisement, a cookie might be placed on your computer. To find out how these kinds of companies tend to collect and use information or to take advantage of any opt-out opportunities they provide, visit their sites to see their privacy policies. We do not control these companies, and their practices and policies may change over time.

If you do not wish to receive cookies, or want to be notified before they are placed, you may set your web browser to do so, if your browser so permits. Please understand that if cookies are disabled, you may not be able to view certain parts of this site that may enhance your visit, or may not be able to complete some actions on our website. Some of our business partners whose content is linked to or from this site may also use cookies or web beacons. However, we have no access to or control over these cookies.

LINKS TO OTHER SITES

This website contains links to other sites. We are not responsible for the content or privacy practices of such other sites. We encourage you to be aware when you leave our site and to read the privacy policy of any other site that collects Personal Information.

SURVEYS & CONTESTS

On occasion, our website may request information through surveys or contests. Your participation in these surveys or contests is completely voluntary and you may choose whether you wish to participate and therefore disclose information. Information requested may include your contact information and demographic information. Contact information will be used to notify winners and award prizes. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site and of our products.

REGISTRATION

You may be required to complete a registration form to access certain services, or enter a contest, or for other purposes. You may be required to provide certain information (such as name, address, email address) which is used to contact you about the products/services on our site, to fulfill your order, or to contact you in connection with your entry in a contest. You may also be asked to provide demographic information (such as gender or age), but this is not required.

MEMBERSHIP PROCESSING

If you choose to become a member, we may request information such as contact information (for example, name and shipping address) and financial information. This information is used for billing purposes. We may also use this information to contact you.

OTHER APPLICABLE TERMS

This Policy does not modify or alter any applicable agreement you have or may have with SICA. Additionally, your use of certain SICA-US services (e.g., the membership), or your participation in certain

special events, activities, or programs (collectively “Additional Services and Programs”) may be subject to one or more applicable agreements or policies, and certain other terms may all apply to your use of, or your participation in, such Additional Services and Programs. If this Policy conflicts with any portion of the terms, agreements, and/or policies relating to Additional Services and Programs, the terms, agreements, and policies of the Additional Services and Programs govern to the extent of the inconsistency.

YOUR RIGHTS

You may see what data we have about you, if any, by contacting us via the email address or phone number provided in this Policy (see <https://www.sicaweb.org/contactus.aspx?locale=en-us> and click the appropriate links for redirection to appropriate country and contact information). If you wish to replenish, rectify, correct, anonymize or delete any incomplete, incorrect or outdated Personal Information (and it is Personal Information that may be changed, see ACCESS TO AND CONTROL OVER PERSONAL INFORMATION, above) or you wish us to cease processing your Personal Information for the purpose of sending promotional materials or direct marketing or for the performance of market research or on other compelling legal grounds, you may, as appropriate and in accordance with applicable law, exercise such rights by contacting us at the email, address, or phone number provided in this Policy (see <https://www.sicaweb.org/contactus.aspx?locale=en-us> and click the appropriate links for redirection to appropriate country and contact information). In some cases, especially if you wish us to delete or cease the processing of your Personal Information, this may also mean that we may not be able to continue to provide the services to you.

Please note that we may need to identify you and to ask for additional information in order to be able to fulfill your above request. Please also note that applicable law may contain restrictions and other provisions that relate to your above rights.

This policy is effective as of August 20th, 2019 and will remain in effect except as modified in the future, which modifications will be effective immediately upon posting. We reserve the right to update or change this Policy at any time, and you should check this page periodically. Your continued use of this site after we post modifications will constitute your manifest acknowledgement and acceptance of the modifications and your consent to be bound thereby.

HOW TO CONTACT US

We respect your privacy and are committed to adhering to the policies outlined in this Policy. If you have any questions, comments or concerns about this Policy or about our privacy practices, please contact us via email, telephone, or mail (see <https://www.sicaweb.org/contactus.aspx?locale=en-us> and click the appropriate links for redirection to appropriate country and contact information).

You may also direct your privacy-related comments or questions to the following address:

1 Lawson Lane, Suite 340
Burlington, VT, USA 05401

THIRD-PARTY RELATIONSHIPS AND YOUR PRIVACY

SICA-US has multiple communication *Peer Member Exchange* platforms that allow members to easily communicate and exchange credit information. Personal Information may be disclosed to and between members for this purpose.

CHANGES TO THIS POLICY

This Policy replaces all previous disclosures we may have provided you about our Personal Information practices. We will update this Policy as our practices change. If we decide to disclose Personal Information in a way that is materially different from that which was stated in this Policy at the time Personal Information was collected, we will notify you by posting notice of the change on our site and on this page for a reasonable period before we implement that change and, if feasible, will give you an opportunity to opt out of the proposed use of Personal Information.

NOTICE TO RESIDENTS OF THE EUROPEAN UNION AND UNITED KINGDOM

If you are a resident of the European Union ("EU") or the United Kingdom ("UK"), you may have certain supplementary rights, as non-limitatively detailed below. For purposes of this notice, "personal data" has the meaning ascribed in the EU General Data Protection Regulation and is included in the notion of Personal Information in our Privacy Policy.

PROCESSING BASES AND CONSEQUENCES

To process your personal data, we rely on the following legal bases:

- For the performance of a contract we have with you.
- For compliance with a legal obligation to which we are subject (such as tax obligations and when we are obliged to comply with lawful requests from competent authorities such as law enforcement).
- For the purposes of our legitimate interests (such as tailoring your experience on our Sites and for fraud detection), provided that such processing does not outweigh your rights and freedoms.

The processing may also be pursuant to other applicable legal bases for data processing, especially provisions set out by Member State law. To the extent that a legal ground described above would not apply to processing of your Personal data by us, we will seek your consent for such specific purpose and/or inform you of same, the whole in accordance with applicable law.

YOUR RIGHTS

To the extent a specific element of our processing of your personal data relies upon your consent, you may withdraw such consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. The Privacy Policy describes the options we provide you to easily decline or withdraw your consent.

If you wish to object to the processing of your personal data on the basis of legitimate interest and no opt-out mechanism is available to you directly, please contact us via our website.

If you do not provide us with certain of your personal data, we may not be able to fulfill the requested purpose of collection, such as to respond to your queries or provide our services to you. However, unless otherwise specified, not providing your personal data will not result in legal consequences for you.

Additional data privacy rights: Below, please find information on additional rights you may have under applicable law:

- **Access:** You may request that we confirm whether or not we are processing your personal data. If we are, you may request a copy of your personal data, which we will provide free of charge, together with information about the such processing, such as the purposes of the processing and the categories of personal data concerned. However, this is not an absolute right and the interests of other individuals may

restrict your right of access. For further copies, we may charge a reasonable fee based on administrative costs. We may decline requests which are excessive, particularly if repetitive.

- **Rectification:** You may ask us to change, update or fix your personal data in certain cases, particularly if it's inaccurate.
- **Erase:** You may request the erasure of your personal data.
- **Restrict Processing:** You may ask us to restrict the processing of your personal data under certain circumstances, such as if your Personal Data is inaccurate or unlawfully held.
- **Data portability:** You may ask for a copy of the personal data you provided to us in a structured, commonly used and machine-readable format and you may have the right to transmit this data to another entity.
- **Object:** You may object to the processing of your personal data on grounds relating to your particular situation under certain circumstances, for example for direct marketing. If you have a right to object and you exercise this right, your personal data will no longer be processed for such purposes by us, unless there are overriding compelling legitimate grounds for the processing or as otherwise provided under applicable law.

Please note that these rights may be limited under applicable laws. To exercise your data subject rights under EU General Data Protection Regulation, please submit your request to our website.

Please note that we may need to retain certain information for recordkeeping purposes, to complete any transactions that you began prior to your request, or for other purposes as required or permitted by applicable law.

INTERNATIONAL TRANSFERS

Personal data may be transferred to and processed by recipients that are located inside or outside the European Economic Area (" EEA"). For recipients located outside of the EEA, some are certified under the EU-U.S. Privacy Shield and others are located in countries with adequacy decisions and, in each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective. Other recipients might be located in countries which do not provide an adequate level of protection from a European data protection law perspective and for which we will base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority, approved codes of conduct together with binding and enforceable commitments of the recipient, or approved certification mechanisms together with binding and enforceable commitments of the recipient. You may request a copy of such appropriate safeguards by contacting us.