

## **PRIVACY POLICY**

**Last Updated: December 28, 2016**

### **Privacy Policy Overview**

TOCA Football, Inc. ("TOCA," "us" or "we") respects your privacy and is committed to protecting it through our compliance with this Privacy Policy ("Policy"). This Policy is applicable to [www.tocafotball.com](http://www.tocafotball.com) (including any versions optimized for viewing on a wireless or tablet device) (our "Website"), all email newsletters published or distributed by TOCA, the TOCA Training App ("App"), and all other interactive features, services, and communications provided by TOCA (collectively referred to herein as "Services").

This Policy describes the types of personal information we may collect from you or that you may provide when you visit our Website or App or otherwise participate in our Services, why we gather your personal information, our practices for collecting, using, maintaining, protecting, and disclosing that information, and how you can manage your personal information and preferences.

In this Policy, "personal information" means any information by which you can be identified or contacted, such as your name, mailing or physical address, email address, telephone number, etc., as well as any information associated with the foregoing.

Please read this Policy carefully to understand our policies and practices regarding your personal information and how we will treat it. This Policy applies to the use and sharing of personal information collected as of the date this Policy is posted. By accessing the Website, App and Services, you agree to be bound by the terms of this Policy and our Terms of Use, which are expressly incorporated herein by reference and made a part of this Policy. If you do not agree to the Policy or Terms of Use, please do not use the Website, App or Services. This Policy may change from time to time. Your continued use of the Website, App or Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

This Policy applies only to personal information submitted and collected online through the Website, App or Services and, unless TOCA specifies otherwise in writing, does not apply to any other information collected by TOCA through any other means, including information that may be collected by TOCA offline. This Policy does not apply to any websites or apps maintained by other third parties to which we may link and TOCA does not

control and is not responsible for the content or activities provided on any third party websites or mobile apps.

We are mindful of the need to provide additional protections for children who visit and/or use our Website, App or Services. Our privacy protections and practices applicable to children under the age of 13 are available at the end of this Policy.

The terms of this Policy are subject to all applicable laws and regulations.

### **Information We Collect About You and How We Collect It**

**User-Provided Information:** You may be required to provide personal information to access or use certain parts or features of our Website, App or Services, including when you:

- Register for an account for the Website, App or Services
- Schedule a training session online at one of our TOCA centers
- Contact us with a comment, testimonial, question or complaint or otherwise correspond with us via email concerning our Website, App or Services
- Fill out a form or subscribe to a newsletter or email list
- Participate in any of our programs, games, special events or promotions such as contests and sweepstakes
- Participate in polls, surveys or questionnaires
- Provide us with business information, such as when you seek employment

If you do not provide the requested personal information, you may not be able to access or use the features of the Website, App or Services where such information is requested.

Depending upon the nature of the transaction, the personal information collected may include your first and last name, username and password, billing or mailing address, telephone number, email address, fax number, zip code, date of birth, age, gender, interests, soccer position, player statistics, social media user name or handle, or other demographic information. Any personal information submitted to us online by job applicants, and by persons specifying that they are submitting personal information in a business capacity, will be used solely for its intended purpose.

**Emails and Social Media Sites:** If you correspond with us by email, mail or via social media, we may retain the content of your communication or social media posting, the email or social media account address from which it is sent, and our response. Content and other information in or related to

emails sent by you to TOCA or postings on any of TOCA's social media platform accounts (such as Facebook, Instagram and Twitter) may be re-posted or used as testimonials or for other marketing purposes in accordance with our Terms of Use. Please be aware that when you receive a receipt acknowledging your email or an upload to one of our social media accounts it means that the message or form has been routed into the Internet, and not that it has been received by us. We also collect information automatically using technology when you visit our Website or social media pages or when you open one of our emails as described in this Policy. For example, if you access our Website or Services through a third party connection or log in through Instagram, Twitter, Facebook Connect or another third party service by "following," "liking" or linking your account to one of our Services, that third party may pass information about you to us, including without limitation, your name, birthday, gender, username or ID number, username or ID number of your friends, the email address associated with your account, your profile picture, physical location, photos, photo likes, photo tags, and an access token to authenticate the third party service. We may also collect additional information regarding your hobbies, interests or "likes" that you make available through your profile on the third party service, any other information you have permitted the third party to share with us, and any information you have made public in connection with that service. Please consult the applicable third party website for further information on how to control or adjust your privacy settings on the third party site as TOCA has no control over such third party website.

***Sweepstakes, Contests and Other Promotions:*** We may offer promotions including sweepstakes or contests on our Website, App or Services, or through our social media platform accounts. Depending on the nature of the promotion, we may require the submission of all or some of the following: your name, email address, postal address, telephone number and birth date. Additional information may be requested and either optional or required depending on the specific promotion. We will only use this personally identifiable information for purposes of administering the promotion or as otherwise explained in the official rules or terms and conditions for the promotion.

***Third Parties:*** We may also collect personal information about you from other third parties, such as demographic firms, to make our future services and marketing efforts more efficient and personalized for you. We may combine all information that you provide to us or we collect over time with information obtained from other sources and may disclose this information within our corporate family of companies or our service providers.

## **Information Collected Through Technology**

We collect information through technology to make our Website, App and Services more interesting and useful to you. For example, when you use our Website or download our App, we may collect your device ID and/or IP address. An IP address is often associated with the portal through which you enter the Internet, like your ISP (Internet Service Provider), your company, or your university. We may also use IP addresses to collect information regarding the frequency with which users visit various parts of our Website or Services or enable certain App features. We may combine this information with other personally identifiable information.

**Cookies Information:** When you visit the Website, we may send one or more cookies – a small text file containing a string of alphanumeric characters – to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the Website. A cookie does not collect personal information about you. We use both session cookies and persistent cookies. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the Website. Persistent cookies can be removed by following your web browser’s directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Website or Services may not function properly if the ability to accept cookies is disabled.

**Google Analytics:** We use a tool called “Google Analytics,” a web analytics service provided by Google, Inc. (“Google”) to collect information about use of this Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other sites they used prior to coming to this Website. We use the information we get from Google Analytics only to improve this Website. Google Analytics collects only the IP address assigned to you on the date you visit this Website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this Website, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this Website by disabling cookies on your browser, however please note that if you do this you may not be able to use the full functionality of this Website.

**Log File Information:** Log file information is automatically reported by your browser each time you access a web page. When you register with or view our Website, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, IP addresses or other device identifiers, browser information, ISP, operating system, location, date/time stamp, clickstream data, referring/exit pages and URLs, domain names, landing pages, pages viewed, and other such information.

**Clear Gifs Information:** When you use the Website or Services, we may employ clear gifs (a.k.a. Web Beacons) which are used to track the online usage patterns of our users anonymously. No personal information from your account is collected using these clear gifs. In addition, we may also use clear gifs in HTML-based emails sent to our users to track which emails are opened by recipients. The information is used to enable more accurate reporting, improve the effectiveness of our marketing, and make the Website and Services better for our users.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To facilitate and provide the information or services that you request from us.
- To contact you (via email, postal mail, or telephone) regarding services that we believe may be of interest to you.
- To operate, maintain, and provide to you the best possible content, features, services, and functionality of the Website, App and Services, and overall customer experience.
- To analyze visits to the Website, App and Services and learn about the interests, preferences, demographics and behaviors of our visitors in aggregate and also on a personal level to better understand your interests and needs, so we can assess demand, identify your service preferences, and improve our services and deliver to you the type of content, features, services and promotions that you are most interested in.
- To process registration requests when you register for our programs or Services, or otherwise administer your participation in our programs or Services.
- To respond to your questions, requests, comments or complaints and determine your satisfaction with our programs and Services.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website, App or Services or any products or services we offer or provide through them.
- To compare and review your personal information for errors, omissions and accuracy.
- To prevent, detect or investigate any fraudulent, abusive or illegal act.
- To allow you to participate in interactive features on our Website, App or Services.
- To administer a promotion, contest, sweepstakes, survey or other feature of our Website, App or Services.
- To send you marketing communications and other information and materials you have chosen to receive regarding our Services, marketing or special events.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We also use your personal information for our everyday business purposes such as security, payment processing, analytics, operations, fraud detection and prevention, reporting, making back-ups and legal compliance.

We use cookies, clear gifs, and log file information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the Website, App or Services; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our Website, App and Services; (d) monitor aggregate metrics such as total number of visitors and traffic; (e) diagnose or fix technology problems reported by our users or engineers that are associated with the IP addresses controlled by a specific web company or ISP; and (f) help you efficiently access information.

**User Content:** Any personal information or content you voluntarily disclose for posting to the Website, App or Services (for instance, any content you post) (referred to herein as "User Content") becomes available to the public via the Website and our business partners. User Content includes, but is not limited to, testimonials, reviews, comments, photos, videos, etc. If you remove User Content, copies may remain viewable in cached and archived pages or if other users have copied or stored your User Content.

TOCA reserves the right, but has no obligation, to monitor the User Content you post on the Website, App or Services. TOCA has the right to remove any such information or material for any reason or no reason including, without limitation, if in its sole opinion, such information or material violates, or may violate, any applicable law or our Terms of Use, or to protect or defend TOCA's rights or property or those of any third party. TOCA also reserves the right to remove information upon the request of any third party.

TOCA may use certain information about you and/or your User Content without identifying you as an individual to third parties. We do this for purposes such as analyzing how the Website, App or Services are used, diagnosing service or technical problems, maintaining security, and personalizing advertisements and promotions.

### **How We Share Your Information**

**Personally Identifiable Information:** We do not share, sell, or rent your personal information to third parties without your prior consent. In limited circumstances, we may share your personal information with our trusted partners, service providers or outside vendors to provide certain services to you and achieve our legitimate business objectives as described below.

- Our affiliates: TOCA may share personal information with its affiliated companies and those companies subsequently acquired by TOCA or its affiliated companies.
- Third Party Service Providers: We may disclose potentially personally-identifying and personally-identifying information to those of our employees, contractors (including website operators), affiliated organizations, service providers, promotional partners and other third parties that provide support services to us such as webhosting, web analytics, mailing, emailing, technical support, etc. or help us market our services, administer our programs and operations, administer promotions, or process any other information on our behalf to provide information or services available at our Website, App or Services. We may store personal information in locations outside the direct control of TOCA (for instance, on servers or databases co-located with hosting providers). These service providers only receive personal information, if such information is needed to perform their function(s), and they are not authorized to use any personal information for any purpose(s) other than the purpose(s) set forth by TOCA.
- Special Events, Promotions and Partnerships with Third Parties: From time to time, we may join with third parties to provide specific services, special events or promotions (such as surveys, contests or

sweepstakes). If you choose to sign up for such services, or participate in a special event or promotion, TOCA may share your personal information with third party partners. We will share only the information that is necessary for the third parties to provide these services or products or otherwise participate in or administer the applicable event. Unless we tell you otherwise, these third parties will not use your personal information for any other purpose other than to provide these services or products or conduct the event. However, we do not undertake to confirm, investigate, or police their practices.

- Compliance with Law and Fraud Protection: We may, and you authorize us to, use and disclose any information: (1) we deem necessary, in our sole discretion, to comply with any applicable law, regulation, governmental request or legal process served on us or our affiliates; (2) to investigate, prevent or take action regarding suspected or actual illegal activities; (3) to enforce our Terms of Use, take precautions against liability, investigate and defend ourselves against any third party claims or allegations, assist government enforcement agencies, or protect the security or integrity of our Website, App or Services; (4) to exercise or protect the rights, property, or personal safety of TOCA, our users or others; (5) to other companies and organizations for credit fraud protection and risk reduction; and (6) to enforce any agreement we have with you.
- Business Transfer: As we develop our business, we may buy or sell assets or business offerings. Customer, email, and visitor information is generally one of the transferred business assets in these types of transactions. We may also transfer such information in the course of corporate divestitures, mergers, or dissolution.

We fully cooperate with law enforcement agencies in identifying those who use our Website, App or Services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful, as determined in our sole discretion. Release of your personal information for security purposes, as described in this agreement to any person or entity under any circumstances shall be based on a determination made solely by us, exercising our own discretion, permission for which is expressly granted by you to us in accordance with this Policy.

**Non-Personally Identifiable Information:** We may share non-personally identifiable information (such as anonymous usage data, referring/exit pages and URLs, platform types, number of clicks, etc.) with interested third parties to help them understand the usage patterns for certain services.

TOCA may allow other companies, called third party ad servers or ad networks, to serve advertisements on the Website. These third party ad



servers or ad networks use technology to send, directly to your browser, the advertisements and links that appear on the Website. They automatically receive your IP address when this happens. They may also use other technologies (such as cookies, JavaScript, or Web Beacons) to measure the effectiveness of their advertisements and to personalize the advertising content.

TOCA does not provide any personally identifiable information to these third party ad servers or ad networks without your consent. However, please note that if an advertiser asks TOCA to show an advertisement to a certain audience and you respond to that advertisement, the advertiser or ad-server may conclude that you fit the description of the audience they are trying to reach.

You should consult the respective privacy policies of these third party ad servers or ad networks. This Policy does not apply to, and we cannot control the activities of, such advertisers.

### **How We Protect Your Information**

The security and confidentiality of your personal information is extremely important to us. TOCA uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of your personal information consistent with industry standards. For example, we use encryption, passwords, and physical security measures to help protect your personal information against unauthorized access and disclosure. Additionally, we limit access to personal information to only those individuals performing a legitimate business function; maintain information collected online behind a firewall-protected server; verify your identity by asking you for an email address or by other means; and store your personal information on servers separate from other corporate information and systems. We cannot, however, ensure or warrant the security of any information you transmit to TOCA or the Website, App or Services and you do so at your own risk. Once we receive your transmission of information, TOCA makes commercially reasonable efforts to ensure the security of our systems. However, please note that this is not a guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. While we strive to protect your personal information and privacy, we cannot guarantee the security of any information you disclose online.

### **Compromise of Personal Information**

In the event that personal information is compromised as a result of a breach of security, TOCA will promptly notify those persons whose personal

information has been compromised, in accordance with the notification procedures set forth in this Policy, or as otherwise required by applicable law.

### **Links to Other Websites and Social Media**

We are not responsible for the practices employed by websites linked to or from our Website or Services nor the information or content contained therein and make no warranty, either express or implied, concerning the content of such site, including the accuracy, completeness, reliability, or suitability thereof for any particular purpose, nor do we warrant that such site or content is free from any claims of copyright, trademark, or other infringement of the rights of third parties or that such site or content is devoid of viruses or other contamination. TOCA may provide links to other websites to you solely as a convenience, and the inclusion of linked sites does not imply endorsement by TOCA of any of the linked sites. Please remember that when you use a link to go from our Website to another website, our Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our Website, is subject to that website's own rules and policies. Please read over those rules and policies before proceeding. We do not ensure the security of your personal information if you visit websites not belonging to TOCA. We further reserve the right to terminate a link to a third party site at any time.

We sometime use third party social media content we obtain from social media platforms such as Twitter, Pinterest, Facebook and Instagram on our Website. The privacy policies applicable to these third party social media platforms and sites are not part of our Policy and may differ from the privacy protections described in this Policy. If you upload content related to TOCA or our Services on third party social media platforms or sites that share information with the general public, user community, and/or other third party sites, it may be used or shared by us on our Website or our social media platforms to promote our brand and services. You should review the privacy policies of any third party sites before using them to ensure that you understand how your content may be used. You can adjust your privacy settings on your accounts with these third party sites to match your preferences.

### **Notification Procedures**

It is our policy to provide notifications, whether such notifications are required by law or are for marketing or other business related purposes, to you via email notice, written or hard copy notice, or through conspicuous posting of such notice on our Website page, as determined by TOCA in its sole discretion. We reserve the right to determine the form and means of

providing notifications to you, provided that you may opt out of certain means of notification as described in this Policy.

### **Your Choices, Opting-Out and Reviewing or Making Changes to Your Information**

By providing TOCA your email address, you consent to our using the email address to send you Website, App and Services related notices, including any notices required by law, in lieu of communication by postal mail. We may also use your email address to send you other messages including, but not limited to, newsletters, account status, legal updates, changes to features of the Website, App or Services, service or product updates, special offers or promotions, or other account information.

If you do not want to receive such email messages, you may opt out by: (1) following the unsubscribe instructions in any of our promotional emails; or (2) sending a written request to the postal or email address set out below. Opting out may prevent you from receiving email messages regarding updates, improvements, promotions or offers. You may not opt out of service-related emails. Opting out does not affect our communications with you via telephone and does not affect our use of your non-personally identifiable information as described in this Policy. NOTE: Please allow up to ten (10) business days for us to process your request. We may continue to send you transactional or operational communications.

You can ask to review, update or make changes to the personal information we maintain about you at any time by sending a written request to the postal or email address set out below, or following the instructions in any promotional email you receive from us. We may take a reasonable period of time to respond. If you request the deactivation or change of information on our system, such information may be retained in our backup systems for a period of time subject to technology restrictions, or as a precaution against systems failures. Some information may be retained for longer periods as required by law, contract or auditing requirements or as otherwise described in this Policy.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Policy on this page. The date the Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this Policy to check for any changes.

## **Contact Us**

If you have any questions about this Policy, the practices of our Website, App or Services, your dealings with our Website, App, or Services, or wish to update us with your preferences, you may contact us using one of the following methods:

- Call: 1.844.444.TOCA
- Email: [appadmin@tocafootball.com](mailto:appadmin@tocafootball.com)
- Send mail to: TOCA Privacy, 2777 Bristol Street, Suite D. Costa Mesa, CA 92626

## **IMPORTANT INFORMATION FOR CALIFORNIA RESIDENTS** **Your California Privacy Rights**

California Civil Code Section 1798.83 permits users of our Website that are California residents to request and obtain from us a list of what personal information (if any) we shared with third parties or corporate affiliates for those entities' direct marketing purposes in the preceding calendar year, and the names and addresses of those third parties. Requests may be made only once a year and are free of charge.

If you are a California resident and would like a copy of this notice, please submit a written request to the following address: TOCA Football, Inc. 2777 Bristol Street, Suite D. Costa Mesa, CA 92626. For all requests, you must put the statement "California Privacy Rights Notice" in the body of your request, as well as your name, street address, city, state, and zip code. You also need to attest to the fact that you are a California resident and provide a current California address for our response. Please note that we will not accept requests via telephone, email, or by facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

## **California Do Not Track Disclosures**

California Business & Professions Code Section 22575(b) (as amended effective January 1, 2014) provides that California residents are entitled to know how a website operator responds to "Do Not Track" (DNT) browser settings. DNT is a feature offered by some browsers which, when enabled, sends a signal to websites to request that your browsing is not tracked, such as by third party ad networks, social networks and analytic companies. We do not currently take actions to respond to DNT signals because a uniform technological standard has not yet been developed. We continue to review new technologies and may adopt a DNT standard once one is created. For information about DNT, please visit: [www.allaboutdnt.org](http://www.allaboutdnt.org).

## **CHILDREN UNDER THE AGE OF 13**

This section of the Policy addresses our privacy policies and practices with respect to children under the age of 13. We recognize the need to provide additional privacy protections when children visit or use the Website, App and Services, which are explained in this section.

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "COPPA") require us to inform parents and legal guardians (as used in this section, "parents") about our practices for collecting, using, and disclosing personal information from children under the age of 13 ("children"). It also requires us to obtain verifiable consent from a child's parent for certain collection, use, and disclosure of the child's personal information.

This section notifies parents of:

- The types of information we may collect from children.
- How we use the information we collect.
- Our practices for disclosing that information.
- Our practices for notifying and obtaining parents' consent when we collect personal information from children, including how a parent may revoke consent.
- How parents can access, change or delete personal information about their children.
- How parents will be notified if our policies and practices with respect to children change.
- All operators that collect or maintain information from children through the Website, App or Services.

This section only applies to children under the age of 13 and supplements the other provisions of this Policy. The other provisions of this Policy apply to teens and adults.

### **Information We Collect from Children**

Children can access many parts of the Website and its content and use many of its features without providing us with personal information. However, some content and features of the Website, App and Services are available only to registered users or require us to collect certain information, including personal information, from them. In addition, we use certain technologies,

such as cookies, to automatically collect information from our users (including children) when they visit or use the Website.

We only collect as much information about a child as is reasonably necessary for the child to participate in an activity, and we do not condition his or her participation on the disclosure of more personal information than is reasonably necessary.

**Information We Collect Directly:** We collect personal information from parents on behalf of their children to register with and create an account for TOCA's App, Website and Services.

If a user has indicated that he or she is a child when trying to create a TOCA account, we will collect his or her parent's email address and obtain verifiable parental consent before collecting any personal information from or about the child.

The child's parent must provide us with the following information to register for an account: the child's name, birth date, zip code, gender and the parent's email address. We also require the parent to create a member name and password on behalf of the child. We may request additional information from your child (such as the child's soccer position), but this information is optional. We specify whether information is required or optional when we request it. TOCA will only collect this information if it is provided by the parent or with the parent's consent.

Additionally, we may collect personal information from all users to:

- Schedule a training session online at one of our TOCA centers
- Contact us with a comment, testimonial, question or complaint or otherwise correspond with us via email concerning our Website, App or Services
- Participate in any of our programs, games, special events or promotions such as contests and sweepstakes
- Participate in polls, surveys or questionnaires

We may enable registered users to communicate with others on or through this Website, App or Services through chat, email, or other social features, and posting to public areas of the Website, App or Services ("Social Features"). The nature of these features allows children to disclose personal information about themselves. We do not monitor or review this content before it is posted, and we do not control the actions of third parties with whom your child shares his or her information. We encourage parents to educate their children about safe internet use and to monitor their children's use of Social Features.

**Automatic Information Collection:** We use some passive technologies, including cookies and Web Beacons, which monitor traffic on our Website and automatically collect information from our users, including children, when they access and navigate through the Website, App or Services and use certain of its features. This demographic information may be associated with a child's personal information that TOCA has collected in accordance with law.

Please note that all commercial sites directed to children under 13 are prohibited by COPPA from conditioning a child's participation in an online activity on the child providing more personal information than is reasonably necessary. Accordingly, TOCA will not collect more personal information than is reasonably necessary on any of the Services.

### **How We Use Your Child's Information**

We may use the personal information we collect from your child to:

- register him or her with the App, Website or Services;
- communicate with him or her about activities or features of the App, Website or Services that may be of interest;
- track his or her performance in training sessions, games or other activities;
- enable him or her to participate in games, reward programs, contests, sweepstakes, events or other promotions;

We use the information we collect automatically through technology (see Automatic Information Collection) and other non-personal information we collect to improve our Website, App and Services and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about the child's preferences, allowing us to customize the content according to individual interests.
- Speed up your searches.
- For other business purposes, such as recordkeeping, transaction fulfillment, and to study ways to better improve our Website, App and Services.

### **Our Practices for Disclosing Children's Information**

We do not share, sell, rent, or transfer children's personal information other than as described in this section.

We may disclose aggregated information about many of our users and information that does not identify any individual or device. In addition, we may disclose children's personal information:

- To third parties we use to support the internal operations of our Website, App or Services and who are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential.
- If we are required to do so by law or legal process, such as to comply with any court order or subpoena or to respond to any government or regulatory request.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of TOCA, our customers or others, including to:
  - protect the safety of a child;
  - protect the safety and security of the Website, App or Services; or
  - enable us to take precautions against liability.
- To law enforcement agencies or for an investigation related to public safety.

In addition, if TOCA is involved in a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of TOCA's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding or event, we may transfer the personal information we have collected or maintain to the buyer or other successor.

**Social Features:** The Website, App or Services may offer Social Features, including instant messaging, chat, email, posting on message boards, posting to social media, and other social features, that enable children to communicate with others on our through the Website, App or Services. We do not control the types of information your children can send or post through them. We encourage parents to educate their children about safety online and to carefully monitor their children's use of Social Features to ensure their children do not disclose their personal information through them.

### **Our Practices for Notifying and Obtaining Consent From Parents For the Collection of Personal Information From Children**



When a child under the age of 13 attempts to register with our App, Website or Services, we send his or her parent an email notifying the parent that the child would like to register and ask the parent to create an account to grant consent for the child to register. If the parent ignores or refuses to register the child, we will delete all contact information from our database within 14 days of such notice. If the parent permits the registration, the child will be granted access to the features described in the notification email.

The Federal Trade Commission (FTC) accepts different methods of obtaining verifiable parental consent for the collection and use of personal information from children. In accordance with the FTC requirements, TOCA uses the services of Veratad (a leading age and identity verification company) to verify the parent's identity by asking for pieces of information such as name, birth date, and physical address. Please note that this information is used solely for purposes of obtaining verifiable parental consent and we do not store this information in our records.

### **Changing or Deleting Your Child's Personal Information**

At any time, you may review the child's personal information maintained by us, require us to change or delete the personal information, and/or refuse to permit us from further collecting or using the child's information.

You can review, change, or delete your child's personal information by:

- Logging into your child's account and visiting his or her account profile page.
- Sending us an email at [appadmin@tocafootball.com](mailto:appadmin@tocafootball.com). To protect your privacy and security, we may require you to take certain steps or provide additional information to verify your identity before we provide any information or make corrections.

### **How Parents Will Be Notified If Our Children's Privacy Practices Change**

We may amend our privacy policies or practices with respect to children at any time. We will provide parents notice by email of any material changes in the way we intend to collect, use or share children's personal information. To ensure you receive these communications, please keep your personal information, including your email address, updated and current at all times. We will apply material changes in our privacy policies or practices in conformance with applicable law, including any parental consent requirements.

## **Operators That Collect or Maintain Information From Children**

The following are all operators that may collect or maintain personal information from children through the Website, App or Services:

K2, Inc.  
1671 Dell Ave. Suite #208  
Campbell, CA 95008  
P. (408) 831-6950  
info@k2-inc.com

Veratad Technologies, LLC  
500 Frank W. Burr Boulevard  
Teaneck, New Jersey 07666  
P. (201) 510-6000  
T. (888) 510-7343  
F. (201) 510-6036  
info@veratad.com