

## CHILDREN'S PRIVACY NOTICE

*Date Last Modified: March 1, 2020*

The Children's Online Privacy Protection Act of 1998 and its rules (collectively, "**COPPA**") require Sports Gravy LLC, a Minnesota limited liability company ("**SportsGravy**"), to inform parents and legal guardians (each a "**Guardian**") about SportsGravy's practices for collecting, using and disclosing personal information from children under the age of thirteen (13) (each a "**Child**"). It also requires SportsGravy to obtain verifiable consent from a Guardian for certain collection, use and disclosure of a Child's personal information. SportsGravy is the operator of all websites and interactive channels that provide the Services as described in SportsGravy's [\[Privacy Notice\]](#) and [\[Terms of Use\]](#). You can contact SportsGravy through one of the many methods provided here or in those documents.

This Children's Privacy Notice ("**Notice**") only applies to children under the age of thirteen (13) and supplements SportsGravy's [\[Privacy Notice\]](#). This Notice informs Guardians of the following:

- The types of information SportsGravy may collect from Children;
- How SportsGravy uses that information;
- SportsGravy's practices for disclosing that information; and
- SportsGravy's practices for notifying and obtaining Guardians' consent when SportsGravy collects personal information from Children, including how a Guardian may revoke consent.

### WHAT INFORMATION IS COLLECTED FROM AND ABOUT CHILDREN?

Guardians can access many parts of the Services and use many of its features without providing SportsGravy with their Children's personal information. However, in order for Children to have their own accounts and access content, SportsGravy must collect certain information, including personal information, from them. In addition, SportsGravy uses certain technologies, such as cookies, to automatically collect information from SportsGravy's users (including Children) when they visit or use the Services. For more information about automatic collection of information, refer to SportsGravy's [\[Privacy Notice\]](#).

Guardians and Children may use the Services in connection with participation in sports organizations, associations, leagues and teams that have engaged with and use the Services. As an initial matter, the Services only collect personal information about a Child and their Guardians if a sports organization, association, league or team has engaged the Services.

In order for a Child to access and use the Services, a Guardian will be asked to provide or confirm information about himself or herself, including the Guardian's name, email address, relationship to the Child, and phone number. Guardians will also provide or confirm their Children's names, birthdates/ages, mailing addresses, email addresses and, where applicable, information about the initial sports program or team. In certain cases, SportsGravy may also collect a Child's email address for the purpose of sending the Child e-mails related to his/her registration and for customer support and access to the Services. If SportsGravy knowingly collects, uses or discloses personal information collected from a Child, SportsGravy will provide notice and obtain a Guardian's consent in accordance with applicable law.

Once a Guardian provides consent, Children can create online accounts with usernames and passwords to access their personalized user dashboards, which record and display their current profiles with SportsGravy. In the course of participating in features of the Services, a Child, sports organization, association, league or team, coach, manager, sports participant, or Guardian may provide SportsGravy with additional information about a Child, such as content that they generate.

SportsGravy only collects as much information about a Child as is reasonably necessary for the Child to participate in the Services, and SportsGravy does not condition his or her participation on the disclosure of more personal information than is reasonably necessary.

Finally, SportsGravy enables users to communicate with others on or through the Services through chat, email and posting to public and private areas of the Services (“**Social Features**”). The nature of these features allows Children to disclose personal information about themselves. SportsGravy does not monitor or review this content before it is posted, and SportsGravy does not control the actions of other users with whom your Child may share his or her information through the Services. SportsGravy encourages Guardians to educate their Children about safe internet use and to monitor their Children’s use of Social Features.

## **HOW SPORTSGRAVY USES AND SHARES INFORMATION FROM CHILDREN**

Personal information regarding a Child may be collected and used to administer and provide the Services, to enable a Child’s registration for the Services, to respond to requests, to personalize communications to a Child and as otherwise set forth in SportsGravy’s [\[Privacy Notice\]](#). Their personal information may also be used for assessment purposes by a coach or member of a team’s management using the Services. In addition, a coach or manager may share your Child’s information through the Services with third parties for evaluation and assessment. Any sharing initiated by a coach or team management should be addressed directly with those parties.

SportsGravy may share a Child’s personal information with third parties to the extent reasonably necessary as follows:

- To third parties SportsGravy uses to support the internal operations of the Services and who have implemented industry standard security controls and/or are bound by contractual or other obligations to use the information only for such purpose and to keep the information confidential;
- If SportsGravy is 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 SportsGravy believes disclosure is necessary or appropriate to protect the rights, property or safety of SportsGravy, SportsGravy’s customers or others, including, without limitation, to:
  - o protect the safety of a Child;
  - o protect the safety and security of the Services; or
  - o enable SportsGravy to take precautions against liability;
- To law enforcement agencies or for an investigation related to public safety; and
- As set forth in SportsGravy’s [\[Terms of Use\]](#).

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

If the information collected from a Child does not identify or allow contact with him or her or his or her device (including, for example, aggregated information), SportsGravy may use and disclose it for any purpose, to the extent permitted by applicable law.

## **HOW GUARDIANS CAN ACCESS, CHANGE, OR DELETE INFORMATION ABOUT THEIR CHILDREN**

SportsGravy only collects personal information from a Child where that Child’s Guardian has agreed to SportsGravy’s [\[Terms of Use\]](#) and has provided consent for the Child to use the Services (and thus provide personal information to SportsGravy). To use and access the Services, the Guardian must first register and/or authorize the Child to be invited to register. Children are not allowed to independently self-register or initiate the registration process, or to access the Services prior to the Guardian’s registration of his/her account and consent to SportsGravy’s [\[Privacy Notice\]](#) and [\[Terms of Use\]](#).

Guardians may review the personal information SportsGravy has collected from their Children, refuse to permit SportsGravy to collect further personal information from their Children, and request that any such personal information SportsGravy has collected be deleted from SportsGravy’s records.

To review, update, or delete your Child's personal information, please contact SportsGravy at [info@sportsgravy.com](mailto:info@sportsgravy.com). To protect your Child's safety, SportsGravy asks for proof of your identification. SportsGravy may deny access if SportsGravy believes there is a question about your identity.

#### **CHANGES TO THE CHILDREN'S ONLINE PRIVACY NOTICE**

SportsGravy may amend this Notice at any time and will make material changes only in compliance with applicable laws. SportsGravy will provide Guardians with notice of any material changes in the way SportsGravy intends to collect, use and share children's personal information. Accordingly, Guardians should update their personal information to provide SportsGravy with current email addresses at all times.

#### **CONTACT US**

Users with questions or concerns regarding their privacy or this Notice should contact SportsGravy by email at [info@sportsgravy.com](mailto:info@sportsgravy.com) or by mail at Sports Gravy, LLC, Attn: General Counsel, 7300 France Avenue South, Suite 200, Edina, Minnesota 55435..