

## COPA Privacy Policy

Last modified: November, 2019

### **1. Introduction**

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COPA Innovation Laboratories, LLC (“COPA,” “COPA Soccer Training Center” or “we,” “our,” or “us”) respects your privacy, and we are committed to protecting it through our compliance with this policy.

This Privacy Policy (our “**Privacy Policy**”) describes the types of information we may collect from you or that you may provide when you visit the website and of our COPA websites (our “**Website**” or “**Site**”) and the COPA mobile application (our “**App**”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- on our Website and App;
- in email, text, and other electronic messages between you and our Website and App;
- when you interact with our advertising and applications on third party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by COPA or any third party;
- any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website or App.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website and Apps. By accessing or using our Website and/or App, you agree to this Privacy Policy. This Privacy Policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of our Website or App after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

### **2. Children Under the Age of 18**

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Our Site, App and services provided through the Site and App are only for users of the age of 18 or older, and for users under the age of 18 who have the consent and supervision of a parent or legal guardian. If you are under the age of 18, please do not attempt to register with us at our Site or using or App, or provide any personal information about yourself to us at any time. If you are under the age of 18 and wish to create an account with us (“Account”), your parent or legal guardian must create the Account, submit your personal information and agree to the Terms of Use, this Privacy Policy, Membership Application and Membership Agreement on your behalf. If we learn that we have collected personal information from someone under the age of 18, we will promptly delete that information. If you believe we have collected personal information from someone under the age of 18, please Contact Us at [info@copastc.com](mailto:info@copastc.com)

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

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#### **Generally**

We collect several types of information from and about users of our Website and App, specifically information:

- by which you may be personally identified, such as name, postal address, billing address, shipping address, e-mail address, home, work, and mobile telephone numbers, driver's license number (or other government identification number), demographic information, date of birth, credit or debit card number (for payment purposes only), Social Security Number, your medical history and related health information (e.g. injuries were limitations), and biometric information (including fingerprints ("**Personal Data**"));
- that is about you but individually does not identify you, such as traffic data, logs, referring/exit pages, date and time of your visit to our Website or use of our App, error information, clickstream data, and other communication data and the resources that you access and use on the Website or through our App; or
- about your Internet connection, the equipment you use to access our Website or use our App and usage details.

We collect this information:

- directly from you when you provide it to us;
- automatically as you navigate through the Website or use our App. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies; and
- From third parties, for example, our business partners.

#### **Information You Provide to Us**

The information we collect on or through our Website or through our App is:

- information that you provide by filling in forms on our Website or the App. This includes information provided at the time of registering to use our Website or App, using our Provider consultation services, purchasing products, or requesting further services. We may also ask you for information when you report a problem with our Website or App;
- records and copies of your correspondence (including email addresses), if you contact us; and
- details of transactions you carry out through our Website or through the App and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website or App.

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website or App or transmitted to other users of the Website or App or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security

measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website and App with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### **Information We Collect Through Automatic Data Collection Technologies**

As you navigate through and interact with our Website and App, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, specifically:

- details of your visits to our Website or App, such as traffic data, location, logs, referring/exit pages, date and time of your visit to our Website or use of our App, error information, clickstream data, and other communication data and the resources that you access and use on the Website or in the App; and
- information about your computer, mobile device, and Internet connection, specifically your IP address, operating system, browser type, and App version information.

The information we collect automatically may include Personal Data or we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties. It helps us to improve our Website and App and to deliver a better and more personalized service by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences, allowing us to customize our Website and our App according to your individual interests;
- recognize you when you return to our Website and our App.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** We and our service providers may use cookies, web beacons, and other technologies to receive and store certain types of information whenever you interact with our Website and App through your computer or mobile device. A cookie is a small file or piece of data sent from a website and stored on the hard drive of your computer or mobile device. On your computer, you may refuse to accept browser cookies by activating the appropriate setting on your browser, and you may have similar capabilities on your mobile device in the preferences for your operating system or browser. However, if you select this setting you may be unable to access certain parts of our Website or use certain parts of our App. Unless you have adjusted your browser or operating system setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website or use our App.
- **Google Analytics.** We use Google Analytics, a web analytics service provided by Google, Inc. (“Google”) to collect certain information relating to your use of the Website. Google Analytics uses “cookies”, which are text files placed on your computer, to help the Website analyze how users use the site. You can find out more about how Google uses data when you visit our Website by visiting “How Google uses data when you use our partners' sites or apps”, (located at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)). We may also use

Google Analytics Advertising Features or other advertising networks to provide you with interest-based advertising based on your online activity. For more information regarding Google Analytics please visit Google's website, and pages that describe Google Analytics, such as [www.google.com/analytics/learn/privacy.html](http://www.google.com/analytics/learn/privacy.html).

#### **4. How We Use Your Information**

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

- to present our Website and its contents to you;
- to present our App;
- to provide our products and services to you;
- to provide you with information, products, or services that you request from us or that may be of interest to you;
- to process, fulfill, support, and administer transactions and orders for products and services ordered by you;
- to provide you with notices about your COPA account;
- to contact you in response to a request;
- to fulfill any other purpose for which you provide it;
- 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, our App, or any products or services we offer or provide through them;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

We may also use your information to contact you about goods and services that may be of interest to you, including through newsletters. If you wish to opt-out of receiving such communications, you may do so at any time by clicking unsubscribe at the bottom of these communications or by visiting your Account Preferences page. For more information, see [Choices About How We Use and Disclose Your Information](#).

#### **5. Disclosure of Your Information**

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We may disclose Personal Data that we collect or you provide as described in this privacy policy:

- to affiliates, contractors, service providers, and other third parties we use to support our business. The services provided by these organizations include providing IT and infrastructure support services, and ordering, marketing, and payment processing services;

- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by COPA about our Website and App users are among the assets transferred;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information;
- to third who may contact you about products and services which may be of interest to you; and,
- with your consent.

We may also disclose your Personal Data:

- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to affiliates and third parties to market their products or services to you if you have not opted out of these disclosures. For more information, see [Choices About How We Use and Disclose Your Information](#);
- to enforce or apply our Terms of Use [www.copastc.com/termsfuse](http://www.copastc.com/termsfuse) and other agreements, including for billing and collection purposes; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of COPA, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Finally, we may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

## **6. Choices About How We Use and Disclose Your Information**

We do not control the collection and use of your information collected by third parties described above in [Disclosure of Your Information](#). These third parties may aggregate the information they collect with information from their other customers for their own purposes.

In addition, we strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with control over your Personal Data:

- **Tracking Technologies and Advertising.** You can set your browser or operating to refuse all or some cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our Website or App may then be inaccessible or not function properly
- **Promotional Offers from COPA.** If you do not wish to have your email address used by COPA to promote our own products and services, you can opt-out at any time by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from us or logging onto your Account Preferences page. This opt out does not apply

to information provided to COPA as a result of a product purchase, or your use of our services.

- **Disclosure of Your Information to Affiliates and Third Parties.** By using our Website and App, you consent to our sharing of your Personal Data with our affiliates and third parties for their promotional purposes. If you wish to unsubscribe from such affiliate and third parties' promotions, you can do so by clicking the unsubscribe link at the bottom of any email or other marketing communications you receive from them. If you wish to opt-out of such sharing, please change your preferences in your Account Preferences page or email us at [info@copastc.com](mailto:info@copastc.com).
- **Targeted Advertising.** To learn more about interest-based advertisements and your opt-out rights and options, visit the [Digital Advertising Alliance](http://www.aboutads.info) and the [Network Advertising Initiative](http://www.networkadvertising.org) websites ([www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org)). Please note that if you choose to opt out, you will continue to see ads, but they will not be based on your online activity. We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can also opt out of receiving targeted ads from members of the NAI on its website.

## **7. Your Rights Regarding Your Information and Accessing and Correcting Your Information**

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You can review and change your Personal Data by logging into our Website or App and visiting either the Settings or Account Preferences sections of our App or Website. You may also notify us through the [Contact Information](#) below of any changes or errors in any Personal Data we have about you to ensure that it is complete, accurate, and as current as possible or to delete your account. We cannot delete your personal information except by also deleting your account with us. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

## **8. Do Not Track Signals**

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Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. At this time, we do not honor such signals, but we currently do not use automated data collection technologies to collect information about your online activities over time and across third party websites or other online services (behavioral advertising).

## **9. Data Security**

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We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. We use encryption technology for information sent and received by us.

The safety and security of your information also depends on you. Where you have chosen a password for the use of our Website or App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Website or on or through our App. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website, in your operating system, or in the App.

## **10. California Privacy Rights**

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California Civil Code Section 1798.83 (California's "**Shine the Light**" law) permits users of our Website that are California residents and who provide Personal Data in obtaining products and services for personal, family, or household use to request certain information regarding our disclosure of Personal Data to third parties for their own direct marketing purposes. If applicable, this information would include the categories of Personal Data and the names and addresses of those businesses with which we shared your Personal Data with for the immediately prior calendar year (e.g. requests made in 2019 will receive information regarding such activities in 2018). You may request this information once per calendar year. To make such a request, please contact us using the Contact [Information www.copastc.com/contactus](http://www.copastc.com/contactus) ] below.

## **11. Changes to Our Privacy Policy**

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We may change this Privacy Policy at any time. It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the Website's home page or the App's home screen. If we make material changes to how we treat our users' Personal Data, we will notify you by email to the email address specified in your account and/or through a notice on the Website's home page or the App's home screen. The date this Privacy 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 accessing the App or visiting our Website and reviewing this Privacy Policy to check for any changes.

## **12. Contact Information**

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If you have any questions, concerns, complaints or suggestions regarding our Privacy Policy or otherwise need to contact us, you may contact us at the contact information below or through the "Contact Us" page on our Website or in the App.

### **How to Contact Us:**

COPA Soccer Training Center  
2640 Shadelands Drive  
Walnut Creek, California 94598  
Telephone: 925-357-8999  
Email: [info@copastc.com](mailto:info@copastc.com)