

# TEAMTHRIVE PRIVACY POLICY

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## 1. Introduction and Scope

This Privacy Policy explains how TeamThrive (“TeamThrive,” “we,” “our,” or “us”), a product operated by TeamThrive, LLC, a Delaware limited liability company collects, uses, shares, and protects personal information in connection with the TeamThrive mobile applications, the TeamThrive website at [teamthrive.com](https://teamthrive.com), and all related features, content, and services (collectively, the “Platform”).

This Policy supplements, and should be read together with, our Terms of Service and, where applicable, our Parental Consent Agreement and Media Release. Capitalized terms used but not defined here have the meanings given in the Terms of Service, including “Athlete,” “Minor Athlete,” “Club,” and “Parent.” Section 9 (Cookies and Tracking Technologies) forms part of this Policy and describes our use of cookies and similar technologies. By using the Platform, you acknowledge this Policy; where we rely on consent, we obtain it as described below.

## 2. Our Role in Handling Information

The Platform serves Clubs, coaches, Parents, and Athletes. Our role under data-protection law depends on the context:

**Where TeamThrive decides how and why information is processed** — for example, operating, securing, and improving the Platform, communicating with account holders, ensuring child safety, and meeting our legal obligations — we act as a “controller” (or “business” under U.S. state laws).

**Where a Club uses the Platform to manage its own team** — for example, maintaining rosters and schedules — TeamThrive may process certain Athlete and Parent information on that Club’s behalf and under its instructions, acting as a “processor” (or “service provider”). In that case, the Club is responsible for its own privacy practices, for the lawful basis of its processing, and for providing any notices and obtaining any consents required from Athletes and their Parents. We encourage Clubs to maintain their own privacy notices.

If you have questions about a Club’s handling of your information, please contact that Club directly. For all other questions, contact us as described in Section 17.

## 3. A Note About Children and Youth Athletes

Because the Platform serves youth athletes, protecting children’s information is central to how we operate. Most information about a Minor Athlete is provided and managed by that Athlete’s Parent, or by a Club or coach acting with the Parent’s documented consent. Only Athletes aged thirteen (13) and older may directly access the Platform, and then only with verifiable Parent consent; a profile for an Athlete under thirteen (13) may exist only where it is created and managed by a Parent (or by a Club or coach acting with documented Parent consent). Our practices for children’s information are described in detail in Section 8 (Children’s Privacy).

## 4. Information We Collect

We collect the following categories of information, depending on how the Platform is used:

### Information you or a Club provide to us

- Account and registration information, such as name, email address, phone number, password, and, for account administrators, role and Club affiliation;

- Athlete profile information, such as the Athlete's name, date of birth, position, statistics, club or team, schedule, and biographical details;
- Parent information, such as the Parent's name, contact details, relationship to the Athlete, and consent records;
- Media, such as photographs and video of Athletes uploaded to the Platform;
- Communications, such as messages, posts, and other content sent through the Platform, and correspondence with our support team;
- Optional health and emergency information, such as injury, medical, or emergency-contact details, where a Parent or Club chooses to provide it (treated as sensitive information); and
- Payment-related information for any paid features, which is processed by the applicable app store or a third-party payment processor; we do not store full payment-card numbers.

#### **Information we collect automatically**

- Device and technical information, such as device type, operating system, app version, browser type, and device or advertising identifiers;
- Usage and log information, such as features used, pages viewed, actions taken, dates and times of access, and crash and diagnostic data;
- Approximate location derived from IP address, used for security, analytics, and localization; and
- Information collected through cookies and similar technologies, as described in Section 9.

#### **Information we receive from others**

- Information from Clubs and coaches who create or manage Athlete profiles;
- Information from app stores, payment processors, and analytics and infrastructure providers; and
- Information from any third-party sign-in service you choose to use to access the Platform.

We do not knowingly collect more information than is reasonably necessary to provide the Platform, and we do not collect precise geolocation, biometric identifiers, or government identification numbers except where expressly stated and, where required, with consent.

## **5. How We Use Information**

We use personal information to:

- create and operate accounts and Athlete profiles, and provide scheduling, roster management, communications, and other features;
- enable recruitment and external-visibility features that you have separately turned on (off by default for Minor Athletes);
- protect the safety of Users — in particular children — and detect, investigate, and prevent abuse, fraud, and security incidents;
- communicate with you about the Platform, including service, security, and administrative messages;
- analyze and improve the Platform and develop new features;
- process payments for paid features; and
- comply with our legal obligations and enforce our Terms of Service.

We do not use Minor Athlete information for behavioral or targeted advertising, and we do not sell it. We do not use the Platform to deliver targeted advertising to children.

## 6. Legal Bases for Processing (EEA and UK)

If you are in the European Economic Area or the United Kingdom, we process personal information on the following legal bases:

- **Contract** — to provide the Platform and perform our agreement with you;
- **Consent** — for optional features and for certain processing of children's and sensitive information, including, where the Athlete is below the applicable age of digital consent, the consent or authorization of the holder of parental responsibility under Article 8 of the GDPR and UK GDPR; you may withdraw consent at any time;
- **Legitimate interests** — to secure and improve the Platform, prevent misuse, and understand usage, where those interests are not overridden by your rights;
- **Legal obligation** — to comply with applicable law, including child-safety reporting; and
- **Vital interests** — to protect the safety of a child or other person in an emergency.

## 7. How We Share Information

We share personal information only as described below:

- **With Clubs and coaches** — as directed through the Platform, so they can manage their teams;
- **With other Users** — to the extent a feature is designed to share it (for example, a schedule shared with a team);
- **With recruitment third parties** — such as coaches, scouts, or college programs, only where the applicable recruitment-visibility consent has been given;
- **With service providers and processors** — who process information on our behalf under contract, such as hosting, analytics, and payment providers;
- **For legal and safety reasons** — with law enforcement or other authorities where we believe in good faith it is required by law or necessary to protect a child or the safety of any person, including reporting apparent child sexual exploitation to the National Center for Missing & Exploited Children (NCMEC);
- **In a business transfer** — in connection with a merger, acquisition, financing, or sale of assets, subject to this Policy; and
- **With your consent** — or at your direction, for any other disclosure.

We do not sell personal information, and we do not share personal information for cross-context behavioral advertising, as those terms are used under U.S. state privacy laws. We never sell the personal information of a Minor Athlete.

## 8. Children's Privacy

**Verifiable parental consent.** Consistent with the U.S. Children's Online Privacy Protection Act ("COPPA") and other children's privacy laws, we do not knowingly collect personal information directly from a child under thirteen (13) without first obtaining verifiable parental consent, except as permitted by law (for example, collecting a parent's online contact information in order to obtain consent). Where a Club or coach creates or manages a profile for a Minor Athlete under thirteen (13), it must have obtained documented Parent consent beforehand.

**Direct notice to parents.** This Policy and our Parental Consent Agreement and Media Release together serve as our direct notice to Parents of the information we collect from and about a child, how we use it, and how we disclose it, as summarized in Sections 4, 5, and 7.

**Parent rights.** At any time, a Parent may review the personal information we have collected from or about their Minor Athlete, request that we correct or delete it, refuse to permit our further collection or use of it, and withdraw any consent, by contacting [privacy@teamthrive.com](mailto:privacy@teamthrive.com) or using available in-Platform controls. Exercising these rights may require us to close the Minor Athlete's profile or certain features.

**Data minimization and no conditioning.** We do not condition a child's participation on the disclosure of more information than is reasonably necessary to use the Platform.

**No targeted advertising; no sale.** We do not use a Minor Athlete's personal information for behavioral or targeted advertising, do not deliver targeted advertising to children, and do not sell or "share" a Minor Athlete's personal information.

**Recruitment visibility.** Recruitment and external-visibility features for a Minor Athlete are off by default and are enabled only with verifiable Parent consent obtained through a higher-assurance method, as described in the Parental Consent Agreement. A Parent may disable them at any time.

**Teen athletes (13–17).** For Athletes aged thirteen (13) to seventeen (17), we do not sell their personal information or process it for targeted advertising, and, where applicable state law requires opt-in consent for such processing of a known minor's data, we do not engage in it.

**Reporting.** If you believe a child under thirteen (13) has provided us personal information without verifiable parental consent, or that a Minor Athlete's information is being misused, contact [privacy@teamthrive.com](mailto:privacy@teamthrive.com).

## 9. Cookies and Tracking Technologies

This Section explains how we use cookies and similar technologies on the TeamThrive website and, in our mobile applications, software development kits ("SDKs"), local storage, and device or advertising identifiers (together, "tracking technologies").

**What tracking technologies are.** Cookies are small text files stored on your device by a website. In mobile applications, similar functions are performed by SDKs, local storage, and device or advertising identifiers. These technologies let us recognize your device, remember your preferences, keep the Platform secure, and understand how the Platform is used.

### Categories we use

- **Strictly necessary technologies** — required to operate the Platform, including authentication, security, and core functionality. These do not require consent.
- **Functional technologies** — which remember your preferences and settings.
- **Analytics technologies** — which help us understand usage and improve the Platform. In the European Economic Area and the United Kingdom, we use these only with your consent.
- **Advertising technologies** — the Platform does not use third-party behavioral or targeted-advertising technologies, and never delivers targeted advertising to children.

**Consent (EEA and UK).** Where required by the ePrivacy rules and the GDPR or UK GDPR, we place non-essential tracking technologies only after you give consent through our consent banner or device controls, and you may withdraw consent at any time. Strictly necessary technologies are used without consent because they are required for the Platform to function.

**Children.** Consistent with our commitment to children's privacy, we minimize tracking on parts of the Platform likely to be used by children and do not use tracking technologies to deliver behavioral or targeted advertising to children.

**Managing your preferences.** You can manage cookies through your browser settings and manage mobile identifiers through your device's privacy settings, including resetting or limiting your advertising identifier. Blocking strictly necessary technologies may prevent parts of the Platform from working.

**Opt-out preference signals.** Where required by applicable law, we honor recognized opt-out preference signals, such as the Global Privacy Control (GPC), as a request to opt out of any "sale" or "sharing" of personal information for the browser or device from which the signal is sent. Because we do not sell or share

## **10. Your Privacy Rights and Choices**

**Account choices.** You can review and update account and profile information through the Platform, adjust communication and feature settings, and disable optional features such as recruitment visibility. You may stop using the Platform and request deletion of your account at any time.

**EEA and UK rights.** If you are in the European Economic Area or the United Kingdom, you have the right to access, correct, delete, restrict, or object to the processing of your personal information, to data portability, and to withdraw consent where processing is based on consent. Withdrawal does not affect processing carried out before withdrawal. You also have the right to lodge a complaint with your local data-protection supervisory authority.

**How to exercise your rights.** You (or a Parent on an Athlete's behalf) may exercise these rights by contacting [privacy@teamthrive.com](mailto:privacy@teamthrive.com) or using available in-Platform controls. To protect your information, we may need to verify your identity before acting on a request, and we will respond within the time required by applicable law. You may use an authorized agent where the law permits; we may require verification of the agent's authority. We will not discriminate against you for exercising your rights. Where we decline a request, you may appeal by contacting [privacy@teamthrive.com](mailto:privacy@teamthrive.com).

## **11. Data Retention**

We retain personal information for as long as an account or profile is active and as needed to provide the Platform, and thereafter only as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, after which we delete or de-identify it. We retain children's personal information only as long as reasonably necessary to provide the feature for which it was collected and delete it on request or upon withdrawal of consent, subject to any retention required by law.

## **12. Data Security**

We maintain reasonable administrative, technical, and physical safeguards designed to protect personal information against loss, misuse, and unauthorized access, disclosure, alteration, and destruction. No method of transmission or storage is completely secure, and we cannot guarantee absolute security. If we become aware of a security incident affecting your personal information, we will notify you and the appropriate authorities where required by law.

## **13. International Data Transfers**

We are based in the United States, and personal information may be processed in the United States and other countries whose data-protection laws may differ from those of your country. Where we transfer personal information from the European Economic Area or the United Kingdom, we use appropriate safeguards, such as the European Commission's Standard Contractual Clauses or the UK International Data Transfer Agreement. You may contact us for more information about these safeguards.

## **14. Third-Party Services and Links**

The Platform may link to or integrate with third-party services, including app stores and analytics and infrastructure providers. We are not responsible for the privacy practices of third parties, and their handling of your information is governed by their own privacy policies. We encourage you to review them.

## **15. U.S. State Privacy Disclosures**

This Section provides additional disclosures for residents of U.S. states with comprehensive privacy laws, including California, and supplements the rest of this Policy.

**Categories of information.** In the past twelve (12) months, we have collected the categories of personal information described in Section 4, including identifiers, contact details, Athlete profile and media, commercial information relating to paid features, internet and device activity, approximate location, and, where provided, sensitive information such as health or emergency information and information about a known child. We collect this information from the sources, and use and disclose it for the purposes, described in Sections 4, 5, and 7.

**No sale or sharing.** We do not sell personal information and do not share it for cross-context behavioral advertising, and we have not done so in the past twelve (12) months. We do not sell or share the personal information of consumers we know to be under sixteen (16) years of age.

**Sensitive information.** We use sensitive personal information, such as any health or emergency information and information about a known child, only for the purposes for which it was provided and as permitted by law, and not to infer characteristics about you.

**Your state rights.** Depending on your state, you may have the right to know or access the personal information we hold about you, to correct or delete it, to obtain a portable copy, to opt out of any sale, sharing, or targeted advertising, to limit the use of sensitive information, and to appeal a denial of your request. We honor these rights as required by applicable law and do not discriminate against you for exercising them.

**How to exercise and appeal.** Submit a request to [privacy@teamthrive.com](mailto:privacy@teamthrive.com) or through available in-Platform controls, as described in Section 10. If we deny your request, you may appeal by contacting [privacy@teamthrive.com](mailto:privacy@teamthrive.com); if you have concerns about our response, you may contact your state attorney general.

**California “Shine the Light.”** California residents may request information about our disclosure of personal information to third parties for their own direct-marketing purposes; we do not disclose personal information for that purpose.

## **16. Changes to This Policy**

We may update this Policy from time to time. If we make material changes, we will provide reasonable notice, such as by posting the updated Policy with a new effective date or by notifying you in or through the Platform. Where a material change affects how we collect, use, or disclose a child’s personal information, we will obtain renewed parental consent where required by law before applying the change to previously collected information.

## **17. How to Contact Us**

If you have questions about this Policy or our privacy practices, or wish to exercise your rights, contact us at: [privacy@teamthrive.com](mailto:privacy@teamthrive.com).