

# **PRIVACY POLICY**

Effective Date: April 2026

THIS PRIVACY POLICY GOVERNS THE MANNER IN WHICH LOCKWARS LLC, A LIMITED LIABILITY COMPANY ORGANIZED UNDER THE LAWS OF THE STATE OF CALIFORNIA (“LOCKWARS,” “WE,” “US,” OR “OUR”), COLLECTS, UTILIZES, STORES, DISCLOSES, AND OTHERWISE PROCESSES PERSONAL INFORMATION RELATING TO INDIVIDUALS WHO ACCESS OR USE THE LOCKWARS PLATFORM, INCLUDING THE MOBILE APPLICATION, WEBSITE, ASSOCIATED FEATURES, TOOLS, INTERACTIVE CONTENT, COMMUNICATIONS, AND SERVICES (COLLECTIVELY, THE “SERVICES”). BY ACCESSING OR USING ANY COMPONENT OF THE SERVICES, YOU (“YOU” OR “USER”) ACKNOWLEDGE AND CONSENT TO THE COLLECTION, USE, AND DISCLOSURE OF YOUR INFORMATION AS SET FORTH IN THIS PRIVACY POLICY. IF YOU DO NOT ACCEPT THE TERMS HEREIN, YOU MUST IMMEDIATELY DISCONTINUE USE OF THE SERVICES.

LockWars is committed to respecting the privacy of our Users and maintaining transparency regarding how your personal information is handled. This Privacy Policy is intended to provide a comprehensive explanation of our data practices.

## **1. INFORMATION WE COLLECT**

When you interact with the Services, LockWars collects various categories of information from you directly, indirectly, and through third-party sources. The nature of the information collected depends on your use of the Services, your interactions with us, and the functionalities you engage with.

### **1.1 Information You Voluntarily Provide**

When you create an account, complete registration, or otherwise provide information directly to LockWars, we collect identifiable personal details including but not limited to your full legal name, chosen username, date of birth, mailing address, phone number, and email address. In instances where applicable laws require identity verification or age verification, we may request government-issued identification documents or comparable credentials to confirm eligibility to participate in the Services.

You may also provide payment-related information, such as your debit or credit card number, financial institution details, or other banking information necessary for processing deposits and withdrawals. Please note that while we facilitate transactions, payment credentials are processed by third-party payment processors acting on our behalf, subject to their own privacy and security practices.

Additionally, LockWars collects content you submit within the Services, including chat communications, profile pictures, lineup entries, user-generated comments, and participation in promotions, or surveys.

Chat communications are ephemeral and are not retained beyond the duration of the applicable team lobby or matchup. While visible during active gameplay, chat content may be temporarily reviewed for moderation or compliance purposes but is not stored after the related contest concludes.

If you choose to communicate with our support channels or otherwise correspond with LockWars personnel, the content of such communications, along with related metadata, may be retained to improve customer service, resolve disputes, or comply with applicable regulations.

LockWars does not intentionally solicit or process sensitive categories of personal data such as health information, racial or ethnic origin, religious beliefs, or biometric data.

This Privacy Policy applies solely to information collected through the Services. It does not apply to information collected offline, through telephone interactions, or through other channels not integrated into the Services.

## **1.2 Information Collected Automatically**

When you access or interact with the Services, LockWars automatically gathers technical and usage-related information generated by your device, browser, and activity. This information may include, without limitation, your device type, operating system version, device identifiers, browser version, screen resolution, language preferences, referring or exit URLs, pages accessed, features engaged, interactions performed, timestamps of visits, duration of use, network type, IP address, and approximate geolocation derived from network or device signals.

To facilitate certain regulatory compliance obligations—such as location-based eligibility restrictions—we may utilize geolocation technologies, including but not limited to GPS, Wi-Fi triangulation, and IP-based inference, to determine your jurisdictional location when accessing specific features of the Services.

Our systems may also collect event logs, diagnostic reports, error reports, crash analytics, and other operational telemetry to improve platform stability, security, and performance.

## **1.3 Information Acquired from External Sources**

LockWars may obtain supplemental information about you from third-party sources, including but not limited to identity verification services, compliance vendors, fraud prevention partners, marketing affiliates, publicly available data repositories, and social media platforms (if you choose to link or authenticate your account using social credentials). Such externally acquired

data may be integrated with your existing profile or used to verify the authenticity and completeness of the information you provided directly.

If you choose to register or log in to the Services using a third-party authentication service, such as Google or Apple, LockWars may access limited account information provided by that service for the purposes of authentication and account linking, subject to the privacy policy of the applicable third-party service.

#### **1.4 Cookies and Tracking Technologies**

LockWars uses cookies, web beacons, pixel tags, and similar technologies to enhance platform functionality, personalize content, analyze engagement, and detect fraudulent activity. These technologies may collect data such as your browser type, device ID, pages visited, IP address, and interaction patterns.

You may adjust your browser or device settings to refuse some or all cookies; however, disabling cookies may impact certain features of the Services. LockWars does not respond to “Do Not Track” signals.

## **2. USE OF INFORMATION**

LockWars uses the information collected for a variety of lawful business purposes intended to deliver, operate, secure, enhance, and administer the Services, including the following:

We use your information to establish, authenticate, manage, and maintain your user account, verify your eligibility to participate in skill-based fantasy sports contests, and facilitate access to gameplay features, team management tools, lineup entry, matchmaking, scoring, and real-time contest updates.

Your payment and financial information are utilized solely to process deposits, facilitate withdrawals, issue promotional credits, resolve transaction disputes, reconcile accounting records, and comply with anti-money laundering and other applicable financial regulations.

LockWars may use your contact information to communicate important notices, including transactional confirmations, account security alerts, feature announcements, changes to terms or policies, gameplay updates, and legal disclosures required by law.

We analyze usage data to evaluate platform performance, monitor for fraudulent or abusive activity, troubleshoot technical issues, and enforce compliance with our Terms of Service and applicable law. Such analysis also informs the development of new features, content recommendations, user interface enhancements, and gameplay mechanics.

Where permissible, LockWars may use your information to tailor promotional communications, loyalty offers, token incentives, contest invitations, and marketing campaigns. You may opt out of receiving certain promotional messages, although we reserve the right to send essential transactional and administrative communications regardless of marketing preferences.

You may opt out of receiving promotional communications by following the unsubscribe instructions provided in marketing emails or by contacting us at [support@lockwars.com](mailto:support@lockwars.com).

Please note that opting out will not affect our ability to send you service-related or legally required communications.

### **3. DISCLOSURE OF INFORMATION**

LockWars may disclose your information to third parties under the following limited circumstances:

#### **3.1 Service Providers**

We engage a variety of service providers who process data on our behalf to enable core functionalities of the Services. These service providers may include, without limitation, hosting vendors, data storage providers, cloud infrastructure operators, payment processors, identity verification companies, fraud detection agencies, analytics providers, customer support tools, and email or messaging platforms. Each service provider is contractually obligated to use information solely for the purpose of delivering the contracted service and to implement appropriate data protection safeguards.

LockWars has partnered with financial services software company Aeropay to offer you ACH payments. When you create a LockWars Account and connect a bank to complete ACH payments, you will be creating an Aeropay account. It is your responsibility to make sure the data you provide us is accurate and complete. You must comply also with Aeropay's privacy policy (the "Aeropay Privacy Policy") when creating or using your LockWars Account. The Aeropay Privacy Policy may be modified from time to time, and the governing version is incorporated by reference into this Privacy Policy.

AeroPay Privacy Policy:

<https://www.aeripay.com/legal/privacy-policy>

LockWars performs due diligence on all third-party providers, including review of their privacy and security practices, and limits their data access to the minimum necessary to perform

contracted functions. These service providers are prohibited from using personal information for their own independent purposes.

### **3.2 Compliance and Legal Requirements**

LockWars may disclose information where we reasonably believe such disclosure is necessary to satisfy applicable laws, regulations, legal processes, or enforceable governmental or judicial requests. This includes disclosures made to regulatory agencies, tax authorities, or law enforcement entities for the purpose of complying with anti-money laundering statutes, fraud detection obligations, dispute resolution procedures, or mandatory reporting requirements.

We reserve the right to disclose information where necessary to protect the rights, property, safety, or security of LockWars, its Users, or the general public, including the investigation and prevention of fraud, misuse, unauthorized access, violations of our Terms of Service, or other unlawful activities.

### **3.3 Business Transfers**

In the event that LockWars is involved in a merger, acquisition, reorganization, divestiture, dissolution, or sale of assets, your information may be transferred to the successor entity or acquiring party as part of the transaction. Any such transfer shall be subject to the commitments set forth in this Privacy Policy unless otherwise disclosed.

### **3.4 Visibility to Other Users**

Certain elements of your profile or activity within the Services—such as your username, team participation, matchup history, chat contributions, leaderboard placement, or other gameplay interactions—may be visible to other users or participants within public or semi-public components of the platform, including but not limited to chatrooms, team lineups, or contest summaries.

LockWars does not sell or share your personal information to third parties for monetary consideration, cross-context behavioral advertising, or profiling purposes.

## **4. DATA RETENTION**

LockWars retains personal information for the duration necessary to fulfill the purposes outlined in this Privacy Policy, including to comply with legal and regulatory obligations, resolve disputes, enforce our Terms of Service, maintain operational records, or satisfy accounting and audit requirements. Retention periods may vary depending on the nature of the data, the legal basis for collection, and applicable statutory limitations.

Whenever feasible, LockWars will retain personal information only for as long as is reasonably necessary to fulfill the purpose for which it was collected and to satisfy applicable legal or operational requirements. Certain data categories may be subject to specific retention periods—for instance, identity verification records may be retained for up to five (5) years to comply with anti-fraud obligations, while ephemeral chat content is discarded shortly after the conclusion of the relevant matchup. When retention of information is no longer required, we will securely dispose of or anonymize the information, consistent with applicable laws and industry best practices.

## **5. DATA SECURITY**

LockWars implements technical, organizational, and administrative measures reasonably designed to safeguard your personal information against unauthorized access, loss, misuse, alteration, or disclosure. Such measures may include encryption of sensitive data during transmission, firewalls, access controls, intrusion detection systems, and periodic security assessments. While we endeavor to protect your information, no security measure is impervious, and you acknowledge that no platform can guarantee absolute data security.

You are responsible for maintaining the confidentiality of your account credentials, including passwords and authentication tokens, and for notifying LockWars immediately upon becoming aware of any unauthorized access or suspected security breach affecting your account. You acknowledge and agree that LockWars is not responsible for unauthorized access arising from your failure to secure your login credentials or device.

## **6. STATE PRIVACY RIGHTS**

Depending on your jurisdiction, you may have certain rights under applicable data protection or privacy laws. These rights may include:

- The right to request access to personal information we maintain about you;
- The right to request correction of inaccurate or incomplete information;
- The right to request deletion of certain personal information, subject to legal and operational retention obligations;
- The right to request a copy of your information in a portable format;
- The right to withdraw consent or object to certain data processing activities;
- The right to opt out of receiving promotional communications.

You may exercise applicable rights by contacting LockWars using the contact details provided below. We may require identity verification before fulfilling certain requests, and some rights

may be limited or unavailable depending on jurisdiction, the nature of the data, or lawful exceptions under applicable law.

You may contact us to access or request correction or deletion of your personal information, or to update your communication preferences. Please email us at [support@lockwars.com](mailto:support@lockwars.com) with any questions or requests.

## **7. ACCOUNT DELETION**

Users may request deletion of their LockWars account and associated personal information at any time by contacting [support@lockwars.com](mailto:support@lockwars.com) using the email associated with their account. LockWars will process verified deletion requests within approximately thirty (30) days, subject to applicable legal, regulatory, fraud-prevention, and accounting retention requirements. Following deletion, certain anonymized or aggregated data may be retained.

## **8. INTERNATIONAL DATA TRANSFERS**

The Services are operated and maintained within the United States. If you access the Services from outside the United States, you acknowledge and consent to the transfer, storage, and processing of your information in the United States or other jurisdictions that may not provide the same level of data protection as your home jurisdiction. LockWars will implement appropriate safeguards to ensure that any such transfers comply with applicable data protection laws.

## **9. THIRD-PARTY SERVICES**

The Services may contain links to external websites, applications, or resources that are not operated or controlled by LockWars. This Privacy Policy does not apply to third-party platforms, and LockWars disclaims responsibility for the privacy practices or content of such third-party services. We encourage Users to review the privacy policies applicable to third-party services before engaging with them.

## **10. CHILDREN'S PRIVACY**

LockWars does not knowingly solicit, collect, or process personal information from individuals under the age of eighteen (18), or under the legal age of majority in their respective jurisdiction, whichever is greater. The Services are intended solely for use by individuals who are legally permitted to participate in skill-based fantasy sports contests. If we become aware that we have

inadvertently collected personal information from an individual who does not meet these eligibility requirements, we will promptly take commercially reasonable steps to delete such information from our records.

## **11. CHANGES TO THIS PRIVACY POLICY**

LockWars reserves the right to update or modify this Privacy Policy at any time to reflect changes in our practices, technologies, legal requirements, or other operational considerations. Any material changes to this Privacy Policy will be communicated by updating the “Effective Date” at the beginning of this document and, where required by law, by providing additional notice or obtaining consent. Your continued use of the Services following the posting of a revised Privacy Policy constitutes your acceptance of the updated terms.

## **12. CONTACT INFORMATION**

If you have questions, concerns, or requests regarding this Privacy Policy or LockWars’ data practices, you may contact us at [support@lockwars.com](mailto:support@lockwars.com).