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# Privacy Notice for Chukker App

Version: 1.0

This privacy notice ("**Privacy Notice**") explains the basis for our collection of personal data when you use our app "Chukker App" ("**App**"), when you use our services, when you communicate with us or when you otherwise deal with us, and sets out how we use your personal data, the conditions under which we disclose it to others, and the measures we take to keep it secure. In addition, we may inform you about the processing of your personal data separately, for example in consent forms, terms and conditions, additional privacy notices, forms, and other notices. We use the word "**data**" here interchangeably with "**personal data**".

If you provide information to us about you or any person other than yourself, you must ensure that the data is accurate and that these other people understand how their data will be used, that they have given their permission for you to disclose it to us and for you to allow us, and our service providers, to use it. You are welcome to provide them with a copy of this Privacy Notice.

This Privacy Notice is aligned with the Federal Data Protection Act ("**FDPA**") and the EU General Data Protection Regulation ("**GDPR**"). However, the application of these laws depends on each individual case.

## 1. **Controller**

The responsible person for processing your data under this Privacy Notice ("**Controller**"), unless we tell you otherwise in an individual case, is:

Chukker App LLC  
Gubelstrasse 11  
6300 Zug  
Switzerland

You may contact us regarding data protection matters and to exercise your rights at:  
[dataprotection@chukkerapp.com](mailto:dataprotection@chukkerapp.com)

Our EU Representative under GDPR is:

Haroon Shabir  
Wambeekstraat 1  
1761 Roosdaal  
Belgium  
[dataprotection@chukkerapp.com](mailto:dataprotection@chukkerapp.com)

## **2. Data Collection and Purpose of Data Processing**

We process the following data about you for the purposes outlined below:

### **2.1 App**

When you visit our App, we collect data that is necessary for the functionality and security of our App.

The data collected includes but is not limited to IP address; information about the operating system of your end device; cookies; referrer URL; amount of data transferred; date, region, and time of the server request; websites accessed or from which access is made; browser type and version; name of your Internet provider; and protocols.

### **2.2 User Account**

Some of our services can only be used with a user account. To use our services, you must download and install the App on your mobile device, create a user account, connect a third-party wallet and pass a KYC check (see Section 2.3 below). We process the data collected in this context in order to provide our services and to ensure their functionality and security.

The data collected includes but is not limited to name, first name, address, email address, date of birth, payment details (where appropriate), polo handicap by country, password, wallet address, information regarding your consent to the Terms of Service, and your acknowledgement of this Privacy Notice.

Please note that we do not have access to the third-party wallet associated with your user account.

### **2.3 KYC Check**

As part of the registration process (see Section 2.2 above), you must carry out a KYC (Know Your Customer) check. We collect the information or data for the purpose of determining your eligibility to access or use the services for legal and regulatory purposes, as well as compliance with any applicable law. To comply with legal requirements and prevent fraud attempts, we collaborate with a third-party service provider specialising in KYC checks. The third-party service provider acts on our behalf to verify your identification and information as part of the registration process.

The data collected includes but is not limited to name, first name, address, email address, phone number, language, nationality, date of birth, gender, legally required information regarding anti-money laundering and combating the financing of terrorism, identification documents, and photographs of your face.

We are legally obliged to collect and store the information and data collected in this context.

## **2.4 Services**

We process your data to enter into a contract with you, perform and administer it, and to provide the following services to you:

### **a) General Contract Conclusion**

We process your data in order to conclude, execute and manage a contract with you and to provide our services to you.

The data collected includes but is not limited to contact details and other information provide by you, information when using our services, information regarding a possible contract conclusion and about the contract conclusion (e.g. services used and provided to you, participation in community-driven experiences or VIP events etc.); information about the execution and administration of the contracts, and information on complaints.

### **b) Scoreline**

We process your data in connection with the display of current and past tournament scores. To enhance user-friendliness, we allow you to add certain clubs as favourites, ensuring that relevant information is displayed in a prioritised manner.

The data collected includes but is not limited to scores, goal scorers, yellow cards, red cards, location and timing of matches, referee names, and added favourite clubs.

### **c) Players**

We process your data to enable you to connect and interact with players. The data is processed to enable this functionality, prevent misuse, and maintain a safe environment for users and players.

The data collected includes but is not limited to connection requests and connected players.

### **d) Ponies and Transport**

We process your data in connection with the marketplace functionalities of the App, where users can offer and purchase ponies for sale, rent, or breeding purposes and offer or request transportation services for ponies from third parties. The data provided is processed to display these offers

in the App, to connect buyers, sellers, providers and principal, and to enable creating purchase syndicate.

The data collected includes but is not limited to contact details, advertisement content (e.g. prompts, descriptions, images, pricing, etc.), offer or rent details, and purchase syndicate details.

#### **e) Play**

We process your data in connection with the booking and purchase of chukkers, tournament tickets, polo holidays, and practice games provided by third parties. The data is processed to enable you to book and purchase services offered by third-party providers through the App. The data is transferred to these third-party providers to complete bookings and purchases and to facilitate direct communication between you and the third-party provider.

The data collected includes but is not limited to name, first name, address, email address, phone number, details of the purchased tickets, booked chukkers, polo holidays, and/or practice games.

#### **f) Shop**

We process your data in connection with the marketplace functionalities of the App, where you can offer and purchase different products and merchandise from third parties. The data provided is processed to display these offers in the App and to connect buyers and sellers.

The data collected includes but is not limited to contact details, advertisement content (e.g. prompts, descriptions, images, pricing, etc.) and offer details.

#### **g) Media**

We offer a diverse range of content related to the sport of polo (e.g. livestreams, videos and podcasts offering insights and highlights) in the App. Your data is processed to enable your access and interaction with this content, and to enhance your experience and to optimise our services. The processing serves the following purposes:

The data collected includes but is not limited to viewing history, interactions and preferences.

## **h) Hire**

We process your data to enable you to apply for jobs offered by third parties through the App. The data is transferred to these third parties to enable further processing of the application.

The data collected includes but is not limited to contact details and personal information (e.g. name, address, email address, telephone number, date of birth, nationality/citizenship), information from your application form (e.g. motivation, position applied for.); application documents (e.g. CV, information about previous employers, references and job references, data on professional experience, information on education and further training, other qualifications), information on salary, and visa requirements.

## **2.5 Marketing and Innovation**

We process your data for marketing and business activities in relation to chukkerCoin, in particular to further develop chukkerCoin, the Chukker ecosystem, the App, and other platforms on which we operate. In addition, we and selected third parties may use your data to show you personalised content or advertising if and to the extent that you give us your consent, provided this is required by applicable law. You can object to such marketing activities or withdraw your consent at any time (see also Section 9 below).

All of the above data may be used for this purpose.

## **2.6 Communication**

When you contact us by email, telephone, letter, or other means of communication, we collect the data exchanged between you and us for the purposes of communicating with you and providing our services to you, in particular to respond to your enquiries. By providing us with this data, you acknowledge that we use your data in accordance with this Privacy Notice.

The data collected includes but is not limited to contact details; type, manner, place and time of communication; and content of communication.

## **2.7 Safety or Security Reasons**

We process your data to protect our IT and other infrastructure. For example, we process data for monitoring, analysis and testing of our networks and IT infrastructures, including access controls.

All of the above data may be used for this purpose.

## **2.8 Compliance with Law and Legal Procedures**

We process your data to comply with legal requirements (e.g. to combat money laundering and terrorist financing (KYC) and to fulfil tax obligations), and we might have to request further information from you to comply with such requirements or as otherwise required by law and legal authorities. Furthermore, we may process your data for the enforcement of legal claims and for the defence in legal disputes and official proceedings.

All of the above data may be used for this purpose.

## **2.9 Risk Management, Corporate Governance and Business Development**

We process your data as part of our risk management and corporate governance in order to protect us from criminal or abusive activity. As part of our business development, we might sell businesses, parts of businesses or companies to others, acquire them from others or enter into partnerships, which might, if necessary, result in the exchange and processing of data based on your consent.

All of the above data may be used for this purpose.

## **2.10 Cookies**

Our App use cookies, and we may also allow certain third parties to do so (see also Section 2.11 below). Cookies are text files that are stored on your device (computer, laptop, smartphone, etc.) and that are necessary for the use of the App as such or certain functions or that enable the analysis of the use of our App.

By using our App, we assume that you consent to the use of such techniques. However, depending on the purpose of these cookies, we may ask for your express consent beforehand. You can access your current settings by opening the “Cookies” section in our App and you can withdraw your consent under the same link at any time.

## **2.11 Tools**

We use the following tool(s) to ensure a tailored design and the continuous optimisation of our App:

### **Google Analytics / Google Firebase**

Google Ireland (based in Ireland) is our provider of “Google Analytics” and “Google Firebase” and acts as our processor. Google Ireland relies on Google LLC (based in the US) as a processor for its services (both “Google”). Google uses performance cookies to track the behaviour of users in the App (duration,

frequency of application viewed, geographic origin of access, analysis of push notifications, etc.) and compiles reports for us on the use of the App on this basis. We have configured the service so that the IP addresses of visitors are shortened by Google in Europe before being forwarded to the US and thus cannot be traced. We have turned off the “Data Forwarding” and “Signals” settings. Although we can assume that the information we share with Google is not personal data for Google, it is possible that Google can draw conclusions about the identity of visitors from this data for its own purposes, create personal profiles and link this data to the Google accounts of these persons. If you consent to the use of Google Analytics and Google Firebase, you explicitly agree to such processing, which also includes the transfer of personal data (in particular usage data for the website and app, device information and individual IDs) to the US and other countries not offering adequate data protection from a Swiss/EU perspective. Information on the data protection of Google Analytics and Google Firebase can be found here [Privacy Disclosures Policy – Analytics Help \(google.com\)](#) and here [Privacy and Security in Firebase](#).

### **Hotjar**

We use Hotjar to improve your user experience. The service provider is Hotjar Inc. (based in Malta). We use Hotjar to analyse and regularly improve the use of our App. We may use the statistics we obtain to improve our offering and make it more interesting for you as a User. Hotjar uses this information on our behalf to evaluate the use of the App, to compile reports on App activity, and to provide other services relating to App activity and internet usage. The information generated by the cookie about your use of the App is usually transferred to a Hotjar server and stored there. We use Hotjar’s anonymisation feature to do this. This truncates your IP address and ensures that the analytics data is not personally identifiable. We do not combine this data with any other personally identifiable information. Information on the data protection of Hotjar can be found here: [Legal overview | Hotjar](#).

### **Mixpanel**

Mixpanel Inc. (based in the US) is our provider of “Mixpanel”, a tool for product analysis. If you consent to the use of Mixpanel, you explicitly agree to such processing, which also includes the transfer and storage of personal data to and in the US and/or other countries that, in view of the EU and/or Switzerland, do not offer an adequate level of data protection. For these cases, the provider complies, according to its own information, with the EU-U.S. Data Privacy Framework and/or relies on Standard Contractual Clauses (SCCs) for providing appropriate data protection safeguards. For up-to-date information please see [Privacy Policy | Mobile & Web User Analytics | Mixpanel](#) and [Data Processing Addendum | Mobile & Web User Analytics | Mixpanel](#).



## **2.12 Third-Party Offerings**

Our App may contain third-party offerings. Please note that when you use such links, your data such as IP address, personal browser settings, etc. are transmitted to these third parties. We have no control over, do not review and cannot be responsible for these third-party websites or their content. Please be aware that the terms of this Privacy Notice do not apply to these third-party websites or their content, or to any collection of your data after you click on links to such third-party websites. We encourage you to read the privacy policies of every website you visit. Any links to third-party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

## **2.13 Sign-In Buttons**

Our website offers easy sign-in option via social sign-in buttons (e.g. "Sign in with Google", "Sign in with Apple"). These functions enable you to log on via your social network login. When you visit the App, the social sign-in plugins are deactivated, i.e. no data is transmitted to the operators of these platforms. If you want to use the social sign-in function, you must click on the respective social sign-in button to establish a direct connection to the server of the respective social media platform, meaning that a transfer of data only takes place after your consent.

The social media platform stores the data collected about you as usage profiles and uses them for purposes of advertising, market research and/or demand-oriented design of its platform. Such an evaluation is carried out in particular (also for non-logged-in users) for the display of targeted advertising and to inform other users of the social media platform about your activities in the App. Your connection to a social media platform, the data transfers that take place between the network and your system, and your interactions on this platform are subject exclusively to the privacy notices of the respective platform. For further information on the purpose and scope of data collection and processing by the social media platform, please review the privacy notices of these social media platforms.

## **2.14 Third-Party Platforms**

We operate accounts on third-party platforms (e.g. Instagram, TikTok, Facebook, Reddit, Telegram, WhatsApp). If you communicate with us via our accounts or otherwise interact with our accounts on these third-party platforms, your data will also be processed according to the privacy policies of the respective platform. Please find further information on the purpose and scope of data collection and processing by the third-party providers in their respective privacy policies.

### **3. Legal Basis for Data Processing**

Insofar as we have asked for your consent, we process your data on the basis of this consent. You can withdraw your consent at any time with effect for the future by sending us a written notification (email to: [dataprotection@chukkerapp.com](mailto:dataprotection@chukkerapp.com)). The withdrawal of your consent affects neither the legality of the processing that we carried out before your withdrawal nor the processing of your data on the basis of other processing grounds.

If we do not need your consent, we will not obtain it and we will process your data for other reasons, such as the initiation/execution of a contract or a business relationship with you, a legal obligation, a vital interest of the data subject or another natural person, or to perform a public task. We may also process your personal data if we have a legitimate interest in doing so, which includes, for example, complying with applicable law and marketing our products and services, the interest in better understanding our markets and in safely and efficiently managing and developing our company, including its activities.

### **4. Transfer of Data to Third Parties**

As part of our data processing, we may share your data with third parties, in particular to the following categories of recipients:

#### **Service Providers**

We may share your information with service providers and business partners around the world with whom we collaborate to fulfil the above purposes (e.g. IT provider, advertising service provider, security companies, banks, telecommunication companies, credit information agencies, address verification provider, lawyers) or who we engage to process data for any of the purposes listed above on our behalf and in accordance with our instructions only.

#### **Contractual Partners**

If required by the respective contract, we will pass on your data to other contractual partners, dealers, subcontractors, etc.

#### **Acquirers of Business**

We may disclose your data to acquirers or parties interested in acquiring business units, companies, or other parts of chukkerCoin GmbH.

#### **Legal Authorities**

We may pass on data to offices, courts, and other authorities if we are legally obliged or entitled to do so or if this appears necessary to protect our interests. The authorities are responsible for processing data about you that they receive from us.

## **5. Disclosure of Data Abroad**

The data that we collect from you may be transferred to, processed, and stored in, a country outside the European Economic Area (EEA) or Switzerland. In the view of the EEA or Switzerland, the law in some of those countries may not offer an adequate level of data protection. We only transfer data to these countries when it is necessary for the performance of a contract or for the exercise or defence of legal claims, or if such transfer is based on your explicit consent or subject to safeguards that assure the protection of your data, such as the US-EU Data Privacy Framework, the US-CH Data Privacy Framework (if and insofar as in force and applicable) and/or the Standard Contractual Clauses approved by the European Commission (SCCs), adjusted according to Swiss law, all of the aforementioned if applicable and required.

## **6. On-Chain Data**

When you use blockchains, you acknowledge that your wallet address and other data/information provided by your transactions, which are considered personal data if relating to an identified or identifiable natural person, are permanently and publicly stored on-chain, which means such data is publicly available to anyone. Neither we, nor any third party, have any power to delete such data published by its users to the blockchain. If you want to ensure that your privacy rights are not affected in any way, you should not transact on blockchains as certain rights may not be available or exercisable by you or us due to the technological infrastructure of the blockchain.

You hereby release and indemnify us of any liability associated with data that you transferred to the blockchain.

## **7. Retention and Storage of Data**

We only process your data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of complying with legal retention requirements and where required to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled. Upon expiry of the applicable retention period, we will securely destroy your data in accordance with applicable laws and regulations.

## **8. Data Security**

We take appropriate organisational and technical security measures to prevent your data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed. However, we and your data can still become victims of cyber-attacks, cybercrime, brute force, hacker attacks and further fraudulent and malicious activity including but not limited to viruses, forgeries, malfunctions, and interruptions, which is out of our control and responsibility. We have also put in place

procedures to deal with any suspected data breach, and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 9. Your Rights

In connection with our processing of your data, you have various rights under applicable data protection law: the right to **information** about how we process which personal data about you, the right to **rectification**, the right to **erasure**, the right to **restriction** of processing, the right to **data portability**, the right to **withdrawal** of a previously given consent, the right to file a **complaint** with the competent data protection authority if you believe that we are not processing your personal data in accordance with data protection requirements, and the right to **object** to a particular processing. However, we ask that you please contact us first if you believe that we are not processing your personal data in accordance with your wishes, so that we can address your concerns and implement appropriate changes.

Please note that we reserve the right to enforce legal restrictions if necessary, e.g. if we are obliged to store or process certain data, have an overriding interest (insofar as we can invoke such interests) or need the data to assert claims. If the exercise of certain rights involves costs for you, we will inform you in advance. We have already referred to the possibility of withdrawing consent in Section 3 above. It is important to note that exercising these rights may conflict with your contractual obligations and could result in consequences such as early termination of the contract or associated costs. Should this occur, we will inform you in advance, unless this has already been contractually agreed.

If you wish to exercise the rights mentioned above, please contact us at [dataprotection@chukkerapp.com](mailto:dataprotection@chukkerapp.com) or at the contact details provided in Section 1, unless otherwise indicated or agreed. Please note that we may need to verify your identity in order to prevent misuse, e.g. by means of a copy of your ID card or passport, unless identification is otherwise possible.

In addition, every data subject has the opportunity to assert their rights in court or to file a complaint with the relevant data protection authority. In Switzerland, the relevant data protection authority is the Federal Data Protection and Information Commissioner (<http://www.edoeb.admin.ch>).

## 10. Amendment of this Privacy Notice

Due to continuous development of our App and the contents thereof, changes in law or regulatory requirements, we might need to change this Privacy Notice from time to time. Our current Privacy Notice can be found in our App.

Last updated: 23/03/25

