

# WAREAGLE TECHNOLOGY'S PRIVACY POLICY

## Introduction

WarEagle Technology, LLC, TMT Gold Club and GoMayweather.com or TMTCard.com (individually or collectively, "WarEagle" or "we") respect your privacy and are committed to protecting it through our compliance with this privacy policy ("Policy"). Maintaining protection of the data entrusted to our care by our constituents is of the utmost importance to WarEagle.

This Policy describes the types of data we may collect from you or that you may provide and describes our policies and practices for collecting, using, protecting, and disclosing that data.

Please also see Appendix A: EU Privacy Notice if you are located in the European Union or European Economic Area.

This Policy may change from time to time (see Changes to Our Privacy Policy section), so check the Policy periodically for the most current version. If you have any questions about the meaning or interpretation of this Policy, the English-language version of this Policy is the official text.

## Data We Collect About You

We collect several types of personal data that can be used to identify you ("Personal Data"), including your:

- Name
- Postal address
- Email address
- Telephone number
- Payment history
- Payment cardholder data
- Sensitive authentication data
- Internet connection
- Equipment used to access our Website and usage details

Depending on the type of interaction that you have with WarEagle, we may also collect your:

- Gender

- Birth year
- Marital status
- Spouse's or parents' name
- Occupation
- Employer
- Wealth data
- Photographs/images

Under limited circumstances, we may collect highly sensitive personal data, such as government ID numbers and/or health information.

### **How We Collect Your Data**

We collect Personal Data from:

- Users of our Website
- Members of the TMT Gold Membership provided by WarEagle Technology, LLC
- Members paying to join the TMT Gold Membership
- People who attend TMT events
- People who participate in TMT's programs

We collect this data:

- Directly when you provide it to us through any interaction offline or in person
- From our website GoMayweather.com or TMTCard.com (our "Website")
- From other TMT websites that link to this Policy
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy
- Automatically, as you navigate through the Website (data collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies)
- When you become a member of the TMT Gold Club
- When you use our services
- When you participate in our programs or sign up for and/or attend any events that we host
- From third parties we contract with to provide services on our behalf, such as event organizers, travel service providers (used by the TMT Gold Club International Travel Service), payment processing

services, email marketing services, and software providers; these service providers may change, or new service providers may be added without notice to you

- When you interact with us in another way, for example, contacting us with an inquiry
- From publicly available resources

### **Data You Provide to Us**

We collect data you provide when you interact with WarEagle, either through our Website or any interaction offline or in person. That data includes:

- Personal data that you provide by making an inquiry or joining as a member of the TMT Gold Club; this includes data provided when registering to GoMayweather.com or TMTCard.com.
- Personal data you provide when participating in services available on our Website, including in:
  - TMT Gold Club Global Rewards
  - TMT Gold Club Ideas
  - TMT Gold Club Shop
  - TMT Gold Club Showcase
- Personal data you provide when you enter a contest or promotion sponsored by us
- Personal data you provide when you report a problem with our Website
- Records and copies of your correspondence (including email, social media posts, and other electronic messages), if you contact us
- Your responses to surveys that we might ask you to complete for research purposes
- Your registration to attend and/or participate in TMT Gold Club events
- Personal data you provide when making a purchase
- Personal data you provide when submitting applications, for example, for grants, fellowships, or scholarships
- Biographical or other data you provide to us, TMT Gold club.
- Details of transactions made through our Website and details of the fulfillment of your orders (you may be required to provide financial personal data before placing an order through our Website)
- Your search queries on our Website

Features that are developed in the future may result in the collection of additional new personal data.

You also may provide data to be published or displayed (hereinafter, "posted") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "User Content"). Your User Content is posted on the Website and transmitted to others at your own risk. We limit access to

certain pages and you may set certain privacy settings for this data from your account profile. However, we cannot control the actions of other Website users with whom you may choose to share your User Content.

### **Usage Details, IP Addresses, Cookies, and Other Technologies**

As you navigate through and interact with our Website, we may automatically collect certain data about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website
- Information about your computer and internet connection, including your IP address, operating system, and browser type

When you are not signed in to your TMT Gold Club account, the data collected in this way is anonymous. It is aggregated into statistical data to help us improve our Website and to deliver a better and more personalized service by enabling us to:

- Estimate our audience size, browser statistics, popularity of content, and usage patterns
- Speed up your searches
- Recognize you when you return to our Website

We use cookies (or browser cookies) for this automatic data collection. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

When you are signed in to a My TMT Gold Club account, we collect usage data that is tied to your individual account. This data is collected to improve site functionality and to tailor site behavior and content to you, and we process this personal data in accordance with this Policy.

### **Third-party Advertiser Use of Cookies and Other Tracking Technologies**

Some advertisements and offers on TMT Gold Club Global Rewards are served by third-party advertisers, ad networks, and ad servers. Additionally, some of the applications accessible from, or on, our Website may be owned by third parties. These third parties may use cookies alone or in conjunction with other tracking technologies to collect data about our users. We do not control these third parties' tracking

technologies or how they may be used. If you have any questions about an advertisement or offer on TMT Gold Club Global Rewards, you should contact the responsible advertiser directly.

### **How We Use Your Personal Data**

We use data 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 provide you with information, products, or services that you request from us
- To offer and fulfill our core business purposes, which include:
  - Fulfilling TMT Gold Club's obligation to members
  - Financial processing
  - Facilitating convention and special event planning
  - Communicating key organizational messages through TMT Gold Club publications and other materials
  - Supporting the programs and membership of TMT Gold Club
  - Complying with any legal obligations
  - Preserving TMT Gold Club's legacy by building and maintaining accurate archives that effectively document TMT Gold Club's history
- 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 or any products or services we offer or provide through it
- To allow you to participate in interactive features on our Website
- To store information about your preferences, allowing us to customize our Website according to your individual interests
- To help us develop and test updates to this Website and other TMT Gold Club applications that support WarEagles' core business purposes
- In any other way we may describe when you provide the personal data
- For any other purpose where we have your consent

### **Disclosure of Your Personal Data**

We may disclose aggregated data about our users, and data that cannot be used to identify any individual, without restriction.

We may disclose personal data that we collect or you provide as described in this Policy:

- To the TMT Gold Club.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal data confidential and use it only for the purposes for which we disclose it to them, including:
  - Travel service providers, such as airlines, hotels, ground transport, and travel agencies
  - Companies that produce, publish, and/or ship TMT Gold Club publications and TMT Gold Club branded goods and other merchandise
  - Online shop vendor
  - Payment processing vendors
  - Financial institutions and fiscal agents when processing financial transactions, such as expense reimbursements
  - Software and applications used for administrative functions such as providing online forms/surveys/applications, newsletter services, online learning, webinar/teleconference services, electronic voting
  - Cloud-based databases used for administrative functions
  - TMT Gold Club convention host committees and other event organizers and vendors
  - Email distribution services
- To third parties to promote TMT Gold Club or for the third party to market their products or services to you if you have consented to these disclosures. We contractually require these third parties to keep personal data confidential and use it only for the purposes for which we disclose it to them.
  - If you do not want us to share your personal data (even when anonymized) with unaffiliated or non-agent third parties for advertising or promotional purposes, you can send an email stating your request to [support@wareaglellc.com](mailto:support@wareaglellc.com)
- To fulfill the purpose for which you provide it
- For any other purpose disclosed by us when you provide the data
- 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.

- If disclosure is necessary or appropriate to protect the rights, property, or safety of TMT Gold Club, Members. This includes exchanging personal data with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **WarEagle Technology, LLC Purchase Privacy Personal Data**

WarEagle will not sell, trade, or share a TMT Gold Club members purchase's personal data, including their name, phone number, email, or physical address, with non-member entities, nor will it send purchasers mailings on behalf of other unrelated organizations. This policy applies to all purchase data received by WarEagle, both online and offline, as well as any electronic, written, or oral communication. WarEagle occasionally uses third-party vendors to manage and process payment data. These vendors are bound by strict confidentiality agreements.

### **Accessing and Correcting Your Personal Data**

You may access and correct your data by:

- Visiting your account profile page on TMT Gold Club's website, if you are a registered user on this Website. See [TMT Gold Club's Frequently Asked Questions](#) for additional information.
- Emailing [support@wareaglell.com](mailto:support@wareaglell.com) to request access to, correct, or delete any personal data that you have provided.

We may choose not to accommodate a request to change or delete data if we believe the change or deletion would violate any law or legal requirement or cause the data to be incorrect.

If you delete your User Content from the Website, copies of your User Content may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of data provided on our Website, including User Content, is governed by our Terms of Use, although for EU/EEA-based individuals this does not prejudice your mandatory rights under EU Protection Law (see Appendix A: EU Privacy Notice).

### **Children Under the Age of 16**

Our Website is not intended for children under 16 years. We do not knowingly collect personal data from children under 16 without parental consent. No one under age 16 may provide any personal data to or on our Website.

If you are under 16, do not:

- Use or provide any personal data on our Website or on or through any of its features

- Register on our Website, make any purchases through our Website
- Use any of the interactive or public comment features of our Website, or
- Provide any personal data about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal data from a child under 16 without verification of parental consent, we will delete that personal data. If you believe we might have any personal data from or about a child under 16, please contact us at [support@wareaglellc.com](mailto:support@wareaglellc.com)

### **Data Security**

We have implemented technical and operational measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. Additionally:

- When developing new or enhancing existing systems and processes, WarEagle implements appropriate data protection throughout its data processing operations.
- All personal data you provide to us is stored on password-protected databases on our secure servers behind firewalls and we use Secure Sockets Layer (SSL) to ensure that the transmission of sensitive data for payments and contributions is encrypted and appropriately safeguarded.
- Employees are trained on the importance of data security and focus specifically on practices for protecting against unauthorized disclosure of personal data.
- We have a documented incident response plan for promptly acting upon events that violate WarEagle's security or privacy policies, should they occur, and this plan is reviewed and updated on an ongoing basis.

The safety and security of your personal data also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. Passwords registered with our Website are encrypted to ensure protection against unauthorized access to your personal data.

Unfortunately, the transmission of personal data 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 over any public network. Any transmission of personal data is at your own risk.

Without prejudice to any mandatory legal obligations to which we may be subject, we are not responsible for circumvention of any privacy settings or security measures on our Website.

### **Changes to Our Privacy Policy**

WarEagle may change, add, modify or remove portions of this Policy at any time, which shall become effective immediately upon posting on this page. The date the Policy was last revised is identified at the bottom of the policy. It is your responsibility to review this Policy for any changes. By continuing to use our Website, maintain your membership in our clubs, use our services, or participate in our programs, you agree to any changes in the Policy.

### **Contact Information**

WarEagle is headquartered in Texas, in the United States. If you have any questions about WarEagle's privacy protection policies or practices, please contact us at [privacy@wareaglellc.com](mailto:privacy@wareaglellc.com)

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## **Appendix A: EU Privacy Notice**

If you are a resident of the European Union (EU) or European Economic Area (EEA) whose personal data we collect, the following additional information applies.

### **Introduction**

If you are an EU or EEA resident and WarEagle knowingly collects your personal data, we will do so in accordance with applicable laws that regulate data protection and privacy. This includes, without limitation, the EU General Data Protection Regulation (2016/679) ("GDPR") and EU member state national laws that implement or regulate the collection, processing and privacy of your personal data (together, "EU Data Protection Law").

This EU privacy notice ("EU Privacy Notice"), which should be read in conjunction WarEagle's Privacy Policy, provides additional information as required under EU Data Protection Law on how we handle or process the personal data we collect and who we may share it with.

This Privacy Notice also provides information on your legal rights under EU Data Protection Law and how you can exercise them.

### **How Personal Data is Collected**

Because of the global nature of WarEagle and our TMT Gold club, WarEagle may hold and process personal data that is collected from clubs, districts, and partner organizations around the world, including within the EU/EEA.

This also means that if you contact the WarEagle network and are a resident in the EU/EEA, your personal data may be transferred from the EU/EEA to WarEagle headquarters in the United States.

U.S. data privacy laws are currently not considered to meet the same legal standards of protection for personal data as those set out under EU Data Protection Law. However, to safeguard personal data received from the EU/EEA, we transfer personal data to the U.S. or other third countries only under an approved contract or another appropriate mechanism that is legally authorized under EU Data Protection Law.

This is to make sure that the personal data that WarEagle receives and processes (as it relates to residents of the EU/EEA) is properly safeguarded in accordance with similar legal standards of privacy provided by EU Data Protection Law.

### **Direct Marketing**

If WarEagle provides direct marketing communications to individuals in the EU/EEA regarding services and/or events that may be of interest, this will be done in accordance with EU Data Protection Law.

Where we contact individuals for direct marketing purposes by SMS, email, fax, social media, and/or any other electronic communication channels, this will only be with the individual's consent or in relation to similar services to services that the individual has purchased (or made direct inquiries about purchasing) from WarEagle before.

Individuals may also object or withdraw consent to receive direct marketing from us at any time, by contacting us at [privacy@wareaglellc.com](mailto:privacy@wareaglellc.com)

### **Lawful Grounds on Which We Collect and Process Personal Data**

We process your personal data for the above purposes, relying on one or more of the following lawful grounds under EU Data Protection Law:

- When you have freely provided your specific, informed, and unambiguous consent for WarEagle to process your personal data for particular purposes
- Where we agree to provide services to you to set up and perform our contractual obligations to you and/or enforce our rights

- Where we need to process and use your personal data in connection with our legitimate interests and need to effectively manage and operate our global organization consistently across all territories. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your legal rights and freedoms and, in particular, your right to privacy; and/or
- Where we need to comply with a legal obligation or to establish, exercise, or defend legal claims

Please also note that some of the personal data we receive and that we process may include what is known as "sensitive" or "special category" personal data about you, for example, personal data regarding your ethnic origin or political, philosophical, and religious beliefs. This is not the type of data that WarEagle routinely collect, but if we process this sensitive or special category data, we will do it only in situations where:

- You have provided us with your explicit consent to use it
- We have a legal obligation to process this data in accordance with EU Data Protection Law
- It is needed to protect your vital interests (or those of someone else), such as in a medical emergency
- You have clearly chosen to publicize this information; or
- It is needed in connection with a legal claim that we have or may be subject to

#### **Disclosing Your Personal Data to Third Parties**

We may disclose your personal data to certain third-party organizations that are processing data solely in accordance with our instructions ("Data Processors"), such as companies and/or organizations that support our business and operations (for example, providers of web or database hosting, IT support, payment providers, event organizers, agencies we use to conduct fraud checks, or mail management service providers), as well as professionals we use such as lawyers, insurers, auditors, or accountants. We use only those Data Processors that can guarantee to us that they have put adequate safeguards in place to protect the personal data they process on our behalf; these guarantees are established by entering data processing agreements that contain appropriate data transfer mechanisms (such as the inclusion of "Standard Contractual Clauses") or provisions where the Data Processors state they are certified under the EU-US Privacy Shield Framework).

In certain circumstances, for example, if you travel on TMT Gold Club Travel rewards business, we may also disclose your personal data to third parties called "Data Controllers." These third parties may include travel agencies, airlines, car rental agencies, and hotels. Because of the nature of the business of the Data Controllers, they will make their own determinations as to how they process your personal data. As Data Controllers, they are required to follow the EU Data Protection Law and are required to protect personal data with adequate safeguards and provide you with notice if their processing goes beyond the instructions WarEagle provided. The types of external third-party Data Controllers listed above may handle your

personal data in accordance with their own procedures, and you should check the relevant privacy policies of these companies or organizations to understand how they may use your personal data.

Other than as described above, we will treat your personal data as private and will not routinely disclose it to third parties without your knowing about it. The exceptions are in relation to legal proceedings or where we are legally required to do so and cannot tell you (such as a criminal investigation). We always aim to ensure that your personal data is used only by third parties we deal with for lawful purposes and who observe the principles of EU Data Protection Law.

### **How Long We Retain Your Personal Data**

WarEagle retains your personal data for as long as necessary in the circumstances — for instance:

- As long you are a member of a club or have a relationship with our network
- For a reasonable period to send you payment information, program information, and marketing materials where we have regular contact with you, or
- As may be needed to enforce or defend contract claims or as is required by applicable law.

WarEagle has adopted a Records Management Policy (which we may make available on request). The criteria we use for determining the relevant retention and disposal periods we adopt are based on the purpose for which we hold data and the reasonable expectations of those whose personal data we collect in these circumstances, taking into account various legislative requirements and guidance issued by relevant EU regulatory authorities.

In accordance with the above retention policy, the personal data that we no longer need will be disposed of and/or anonymized so you can no longer be identified from it.

### **Your Personal Data Rights**

In accordance with your legal rights under EU Data Protection Law, you have a "subject access request" right, under which you can request information about the personal data that we hold about you, what we use that personal data for and who it may be disclosed to, as well as certain other information.

Usually we will have one month to respond to a subject access request. However, we reserve the right to verify your identity, and we may, in case of complex requests, require an additional two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests. We may also require additional information to locate the specific data you seek, and certain legal exemptions under EU Data Protection Law may apply when we respond to your subject access request.

Under EU Data Protection Law, EU/EEA residents also have the following rights, which you may exercise by making a request to us in writing:

- That we correct your personal data if it is inaccurate or incomplete
- That we erase your personal data without undue delay if we no longer need to hold or process it
- To object to any automated processing (if applicable) that we carry out in relation to your personal data
- To object to our use of your personal data for direct marketing
- To object to and/or to restrict the use of your personal data for a purpose other than those set out above unless we have a compelling legitimate reason; or
- That we transfer personal data to another party where the personal data has been collected with your consent or is being used to perform services under a contract with you and is being processed by automated means

So we can fully comply, please note that these requests may also be forwarded to third-party data processors that are involved in the processing of your personal data on our behalf.

If you would like to exercise any of the rights set out above, please contact us at [privacy@wareaglellc.com](mailto:privacy@wareaglellc.com)

If you make a request and are not satisfied with our response, or you believe that we are illegally processing your personal data, you have the right to complain to the Office of the Information Commissioner in the United Kingdom or the E.U.