

## 2NDPRIME, LLC – PRIVACY POLICY

Version 2026-07-v4 – Effective July 1, 2026

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2ndPrime, LLC ("Provider," "2ndPrime," "we," "us," or "our") is committed to treating your information responsibly. This Privacy Policy (the "Policy") sets forth our practices with regard to information provided by you and/or collected through our website at 2ndprime.io and its subdomains, our mobile-optimized progressive web app, and any feature, scoring engine, community function, workout module, brand-building tool, push notification, or other service we provide (collectively, the "Services").

By using the Services, you consent to the practices described in this Policy.

### ----- COLLECTION OF YOUR PERSONAL INFORMATION -----

#### Account and Identity Information

Name, email address, phone number (optional), and account credentials created through Google OAuth or other authentication mechanisms. Family role (parent / guardian / extended family / athlete), professional-access role (a family lawyer or athletic agent you invite), and family-seat and professional-seat invitation tokens. Community handle, identity style (sport\_identity such as "Football Mom" or anonymous), and community profile fields. Pilot status, founding-cohort indicators, vouch history, and admin role indicators (where applicable).

For an Invited Professional (a family lawyer or athletic agent) who accepts a professional seat, we collect that professional's name, email address, professional-access role (lawyer or agent), the account through which they authenticate, and the duration and scope of the seat grant. This information is collected at the direction of the inviting Customer for the purpose of operating the professional-seat feature.

#### Athlete and Family Profile Information

Athlete's sport, position, school, year of eligibility, redshirt and COVID-year usage, scholarship status, and similar fields that you supply to power eligibility intelligence and transfer-portal calculations. Family-account membership data, including the identity of Seat Users you invite.

#### Contract Content and Extracted Data

Files you upload (PDF, DOCX, TXT) including NIL endorsement contracts, collective agreements, scholarship documents, agency agreements, and any related correspondence. Structured fields extracted from those documents (counterparty

name, dates, dollar amounts, deliverable schedule, exclusivity terms, termination clauses, renewal terms, payment schedule, and similar). Scoring Outputs derived from the extracted fields, including Family Protection Score, Risk Flags, and 6-dimension subscores.

#### Community Content

Posts, comments, mentions, AMA questions, ritual RSVPs, and vouches you submit. Direct messages exchanged with other connected families. Reactions (likes, saves, reports, upvotes) and connection requests.

#### Workouts and Athletic Performance Data

Workout generation inputs (sport, phase, equipment), generated workout plans, set logs (weight, reps, completion flags), and detected personal records (PRs). AI Strength Chat conversational history.

#### Brand Plan Data

5-step brand assessment inputs (identity, audience, voice, channels, goals) and generated Brand Score and strategy documents.

#### Decisions and Governance Log

Append-only entries recording family decisions: contract approvals, declines, counter-offers, attorney consultations, transfer-intent changes, and brand-strategy shifts.

#### Billing Information

Payment information is processed and stored by Stripe, Inc., our third-party payment processor. Provider does not store full credit card numbers, expiration dates, CVV codes, or banking credentials on its servers. We retain subscription metadata, including plan tier, billing cycle, subscription status, pilot grants, and Stripe customer and subscription IDs.

#### Device, Browser, and Usage Information

IP address, browser type, operating system, device type, screen size, referrer URLs, access timestamps, language preference, and clickstream within the Services. Push notification subscription endpoints and VAPID keys (when you opt in to web push). Session and authentication cookies; analytics and performance event data.

#### Anonymous and Aggregated Data

We collect anonymous demographic and aggregated usage information that is not unique to you and that we may use for product analytics, market benchmarks, and platform improvement.

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### CHILDREN'S PRIVACY

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Provider strongly advocates protecting the privacy of minors. The Services are designed for use by adults (eighteen years of age or older), typically the parent

or guardian of a Division I athlete. We do not knowingly collect personally identifiable information directly from any child under the age of eighteen through the Services.

Where a parent or guardian uploads information about their own family's athlete who is a minor, the parent or guardian represents that they have the authority to do so and that they have obtained any consents required by applicable law. If you believe a minor has provided personally identifiable information to the Services without parental consent, please contact [info@2ndprime.io](mailto:info@2ndprime.io) and we will take appropriate steps to delete such information.

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#### USE OF YOUR PERSONAL INFORMATION

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We collect and use your personal information to:

- Operate, deliver, maintain, and improve the Services.
- Generate Scoring Outputs, Risk Flags, Guidance Cards, plain-English translations, and other deterministic outputs based on the documents you upload and the data you supply.
- Send operational and transactional communications, including subscription notices, payment receipts, security alerts, deadline notifications, daily protection popups, and rule-change alerts.
- Send marketing communications, subject to your right to opt out at any time via the unsubscribe link in any marketing email.
- Personalize automated email communications using information from your account activity, uploaded contracts, and Family Protection Score. Some email content is generated using artificial intelligence based on your in-app behavior and contract analysis. You may opt out of behavioral email communications at any time by contacting us at [keeno@2ndprime.io](mailto:keeno@2ndprime.io).
- Moderate the Family Network community, enforce Community Conduct Rules, and investigate reports of abuse, defamation, harassment, doxxing, PII exposure, or unverified accusation.
- Detect and prevent fraud, abuse, rate-limit evasion, and security incidents.
- Comply with legal obligations and respond to lawful requests from courts, regulators, and law enforcement.
- Improve the Services through anonymized analysis of usage patterns, contract clause patterns, and Scoring Output trends.

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#### AI PROCESSING AND THIRD-PARTY EXTRACTION

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To extract structured data from the contract documents you upload, the text of those documents is transmitted to a third-party artificial intelligence provider (currently OpenAI). The third-party AI provider processes the text for the limited purpose of extraction; downstream calculations (scoring, risk flagging, guidance generation) occur within our own deterministic engine and do not use AI. The

third-party AI provider's handling of transmitted data is governed by that provider's own terms and privacy policies.

The Services may also include conversational AI features (for example, the AI Strength Chat in the Workouts module or AI-assisted features in the Brand Builder). Inputs to those features are transmitted to the third-party AI provider in accordance with that provider's policies.

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#### ANONYMIZED LEARNING AND MARKET BENCHMARK LIBRARY

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Once a contract has been fully processed and reached a complete resolved state, anonymized clause patterns and term ranges from that contract may be incorporated into a market pattern library used to produce benchmarks and detect risk patterns across the platform. Before any data contributes to the library, we remove personally identifying information including but not limited to athlete names, school names, counterparty names, exact dollar amounts, and other identifying details.

This use of anonymized data is a core feature of the Services. By using the Services, you grant Provider a perpetual, irrevocable, worldwide, royalty-free license to use such anonymized data for the purposes described in this Section. Termination of your subscription does not require deletion of anonymized data already incorporated into the library.

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#### PII DETECTION AND CONTENT MODERATION

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To protect Community members, the Services automatically scan Community posts, comments, and direct-message bodies for patterns that indicate the presence of personally identifying information (such as Social Security numbers, phone numbers, and street addresses) and for language patterns that may constitute defamation, named accusation, or other policy violations. Content that triggers these scans is flagged for human moderator review; in some cases, content may be auto-hidden pending review.

Provider may review Community Content, including direct messages between connected families, where necessary to investigate a report, enforce these Terms, comply with legal process, or protect the safety of the Community. Direct messages are not end-to-end encrypted.

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#### SHARING OF PERSONAL INFORMATION

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We share personal information only as follows:

- Third Party Vendors that operate the Services on our behalf, including Stripe

(payments), OpenAI (AI extraction), Replit (hosting and authentication), Upstash (Redis queue infrastructure), email delivery providers, push notification providers, error tracking providers (such as Sentry), and analytics providers.

- Other Community members, but only the information you have chosen to share publicly (your community handle, identity style, posts, comments, and connection state). Direct messages are visible only to the connected families that are party to them, subject to admin moderation review.

- Professionals you invite – if you invite a family lawyer or athletic agent to a professional seat, the data you authorize (your contracts, Scoring Outputs, timeline, decisions, and risk flags) is shared with that invited professional at your direction. We do not vet, endorse, or supervise invited professionals; you choose whom to invite and may revoke access at any time. We do not share your data with any professional you have not invited.

- In response to legal process – a subpoena, court order, regulatory inquiry, or other lawful request, or where Provider believes in good faith that disclosure is necessary to (a) conform to the edicts of the law; (b) protect and defend Provider and its affiliates; or (c) act to protect other users of the Services or the public.

- In connection with a business transaction – as part of any merger, acquisition, sale of company assets, financing, or transition of service to another entity, as well as in the unlikely event of insolvency, bankruptcy, or receivership.

Except as provided above or elsewhere in this Policy, we will not sell, rent, lease, or disclose your personal information to third parties without your consent. WE DO NOT SELL YOUR PERSONAL INFORMATION.

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#### USE OF COOKIES AND SIMILAR TECHNOLOGIES

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The Services use cookies, local storage, and session storage to help personalize your online experience, maintain your authentication session, remember preferences (such as the Parent Mode toggle and the dashboard sidebar persistence state), and measure usage.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Services.

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#### PUSH NOTIFICATIONS

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If you opt in to web push notifications, your browser provides us with a push

subscription endpoint, which we store in order to send you operational alerts (such as a deadline within 48 hours, a missed payment, or a new high-severity risk flag). You may revoke this permission at any time via your browser settings. Push notifications are subject to the policies of your browser and operating system; we are not responsible for missed notifications resulting from withdrawn permission or device limitations.

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## SECURITY OF YOUR PERSONAL INFORMATION

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Provider maintains physical, electronic, and procedural safeguards that comply with applicable federal standards to guard your nonpublic personal information, including encrypted transport (HTTPS/TLS), encrypted-at-rest storage where applicable, role-based access control with admin audit logging, deterministic governance lock (DGL) integrity verification of canonical engine files, rate limiting, input validation, and incident-response procedures. We have policies in place that prohibit employees and contractors from accessing your personal information unless there is a legitimate business reason to do so.

No method of transmission over the internet or method of electronic storage is 100% secure. We cannot guarantee absolute security.

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## DATA RETENTION

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Provider retains your personal information for as long as necessary to provide the Services and fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law. When your account is terminated, Provider will delete or anonymize your personal information within a reasonable time period (typically within thirty (30) days), except (a) where retention is required by law, (b) where information has already been anonymized and incorporated into the market pattern library, or (c) where retention is necessary to resolve outstanding disputes or enforce agreements.

You may request a copy of, correction of, or deletion of your personal information at any time by emailing [info@2ndprime.io](mailto:info@2ndprime.io). We will respond to verified requests within thirty (30) days, subject to the exceptions in this Section.

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## YOUR PRIVACY RIGHTS

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Depending on your jurisdiction, you may have certain rights regarding your personal information, including:

- The right to access the personal information we hold about you.
- The right to request correction of inaccurate personal information.
- The right to request deletion of your personal information, subject to legal and

operational retention requirements.

- The right to request export of your personal information in a machine-readable format.
- The right to opt out of marketing communications.
- The right to opt out of the sale of personal information (we do not sell your personal information).

To exercise any of these rights, contact [info@2ndprime.io](mailto:info@2ndprime.io). We may require verification of your identity before fulfilling a request.

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#### INTERNATIONAL USERS

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The Services are operated from the United States. If you access the Services from outside the United States, your information may be transferred to, stored, and processed in the United States, where data protection laws may be different from those in your jurisdiction. By using the Services, you consent to such transfer.

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#### THIRD-PARTY WEBSITES

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The Services may contain hyperlinks to third party websites and resources, including without limitation Stripe, OpenAI, Google, attorney websites surfaced through the Attorney Referral feature, school sites, governing-body sites, and social media platforms referenced in the Brand Builder. Provider encourages you to review the privacy statements of such third party sites. Provider is not responsible for the privacy statements or other content on such third party websites.

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#### CHANGES TO THIS POLICY

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Provider will occasionally update this Privacy Policy. When material changes are made, Provider will notify registered users via the email address on file or by posting a prominent notice on the Site prior to the change becoming effective. Provider encourages you to periodically review this Policy to be informed of how Provider is protecting your information. Your continued use of the Services after notice of changes constitutes your acceptance of the updated Policy.

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#### CONTACT INFORMATION

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2ndPrime, LLC  
[info@2ndprime.io](mailto:info@2ndprime.io) | [support@2ndprime.io](mailto:support@2ndprime.io)  
<https://2ndprime.io>  
Effective June 2026

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