

INTRODUCTION

The Velodrome Fund d/b/a Valley Preferred Cycling center ("VPCC or "we") is committed to respecting your privacy. This Privacy Policy ("Policy") describes how we collect, process, and share your Personal Data. This Policy describes your rights and choices with respect to your Personal Data (as defined below) and other important information. Please read this Policy carefully.

KEY POINTS

The Velodrome Fund leases the velodrome from Lehigh County and operates training and racing programs at this venue. We use Personal Data for various business purposes, e.g. to improve our products and services, personalize your experience across your interactions with us.

We use Personal Data for commercial purposes, such as marketing and advertising. As part of these activities, we may receive information from third parties but we do not share your personal data with these third parties.

You have rights and choices with respect to how we collect and use your Personal Data.

You can contact us at any time if you have questions.

SCOPE OF THIS POLICY

This Policy applies to your use of our "Services," which include the following:

Our "Offline Services"

- Services you use when you visit our Events or Venues, purchase a ticket for an event on-site, or otherwise visit a venue owned, operated, promoted, or serviced by Our Group (as defined below).

Our "Digital Services"

- Our websites, mobile applications, and other online services, including data collected when you interact with or reference our products/services or advertisements online, as well as via social media (e.g. when we correspond with you via social media, when we access information provided by social media platforms in relation to our pages on those platforms, or if you reference or interact with our Event and Venue (as defined below) on social media).

Note that certain third parties may be able to identify you across sites and services using the information they process, however, any such processing not done at the direction of AEG is outside the scope of this Policy.

HOW TO CONTACT US

If you have any comments or questions about this Policy or privacy practices, please contact our Data Privacy Team at:

The Velodrome Fund

Attn: Privacy

1151 Mosser Road

Breinigsville, PA 18031

CATEGORIES AND SOURCES OF PERSONAL DATA

The following describes how we process data relating to identified or identifiable individuals and households ("Personal Data"), including the categories of Personal Data, its sources, and the purposes for which we process that Personal Data.

THE CATEGORIES OF PERSONAL DATA WE PROCESS

The categories of Personal Data we collect and use include (specific data are examples, and may change):

Identity Data

Information such as your name; address; email address; telephone number; gender; date of birth, age and/or age range; account login details, e.g. username and password, avatar, or other account-related information; information you provide in connection with your application to be a vendor, volunteer, employee, or otherwise join or support our team; your identity, public profile, and similar information from social networks such as Facebook; and information such as unique IDs and similar data collected or derived from the use of tickets

Contact Data

Identity Data that relates to Information about how we can communicate with you, such as email and physical addresses, social media handles, and information you provide to us when you contact us by email or when you communicate with us via social media.

Device/Network Data

Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. IP Address, MAC Address, SSIDs or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, browsing data, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

Commercial Data

Information about the Services we provide to you and about transactions you make with us or other companies for events and services at our Events and Venues (including for example, information about purchases, what has been provided to you, when and where and, if applicable, how much you paid) and similar information.

Financial Data

Information such as bank account details, payment card information, and information from credit reference agencies, including similar data defined in Cal Civ Code § 1798.80(e).

Audio/Visual Data

Recordings and images collected from our surveillance cameras when you visit Events and Venues and areas adjacent to them, as well as audio files and records, such as voice mails, call recordings, and the like.

Health Data

Information about your health (for example when you are buying tickets for wheelchair accessible spaces, when you request a sign language interpreter, or when we are responding to an accident which may have happened at one of our Events and Venues).

User Content

Unstructured/free-form data that may include any category of Personal Data, e.g. data that you give us in free text fields such as comment boxes, answers you provide when you participate in sweepstakes, contests, votes and surveys, including any other Personal Data which you may provide through or in connection with our Services.

Protected Category Data

Characteristics of protected classifications under California or federal law, e.g. race, national origin, religion, gender, or sexual orientation.

SOURCES OF PERSONAL DATA

We collect Personal Data from various sources, which vary depending on the context in which we process that Personal Data:

Data you provide us

We will receive your Personal Data when you provide them to us, when you purchase our products or services, or complete a transaction via our Services, or when you otherwise use our Services.

Data we collect automatically

We collect Personal Data about or generated by any device you have used to access our Services, the websites or mobile applications of other companies in Our Group, the websites of any ticketing service provider used to purchase a ticket to our Events and Venues, or when you use WiFi at any of our Events and Venues.

Data we receive from Service Providers

We receive Personal Data from ticket agents such as Eventbrite, BikeReg, and others, who transfer Personal Data to us when you purchase a ticket from them for our Events and Venues, and other service providers performing services on our behalf.

Data we receive from social media companies

We receive Personal Data from Facebook and other social media companies who may transfer Personal Data to us when you register for one of our Services, or interact with that social media company on or in connection with our Services, Events and Venues.

Data we create or infer

We, certain partners, social media companies, and third parties operating on our behalf, create and infer Personal Data such as Inference Data or Aggregate Data based on our observations or analysis of other Personal Data processed under this Policy, and we may correlate this data with other data we process about you. We may combine any Personal Data about you that we receive from you, from other companies in Our Group, and from third parties.

HOW WE PROCESS PERSONAL DATA

When you use our Services, we process your Personal Data in specific contexts and for certain specified purposes, as well as for our general business purposes and, in some cases, for commercial purposes.

HOW WE COLLECT AND USE PERSONAL DATA

We collect and process Personal Data in several contexts when you use our Services, including:

WHEN YOU MAKE A PURCHASE OR OTHER TRANSACTION THROUGH OUR SERVICES

- When you attend our Events Venues
- When you access or use our Digital Services
- Cookies and other tracking technologies
- When you enter a contest or other promotion
- When you contact us or submit information to us
- Feedback and Surveys
- Applications for employment or to provide services

See below for more information regarding the context in which we process Personal Data.

WHEN YOU MAKE A PURCHASE OR OTHER TRANSACTION THROUGH OUR SERVICE

We generally process Identity Data, Financial Data, Commercial Data and Contact Data when you engage in a purchase and sale transaction. We process this Personal Data as necessary to perform or initiate a contract with you, process your order and payment, and carry out fulfillment and delivery. In addition, we may also collect or create Device/Network Data and Inference Data. This data, together with other data we collect in this context is used as necessary in connection with certain legitimate business interests, such as:

ensuring the security of our Services and to prevent fraud;
providing you with information about our Services, to contact you about administrative matters, to manage and respond to any queries or complaints you make or any correspondence you send us.

We may also use Identity Data, Financial Data, Commercial Data, Contact Data, and Device/Network Data collected in this context for our commercial purposes.

WHEN YOU ATTEND OUR EVENTS AND VENUES

We generally process Identity Data, Commercial Data, Financial Data, and Contact Data when you interact with us Offline at our Events and Venues.

We may process this data in combination with Inference Data and Location Data that we collect and/or create as necessary in connection with certain legitimate business interests in:

- verifying your identity for authentication and security purposes;
- helping us to ensure our customers are genuine and to prevent fraud;
- to help us to return lost property to its rightful owner; and
- managing access to specific areas of our Events and Venues.

Note, in certain cases, we may collect Health Data or Biometric Data. Health Data is generally used so that we can provide you with tailored services (for example, a wheelchair accessible space or a sign language interpreter) or to help us investigate an incident which may have taken place at our Events and Venues. Biometric Data may be collected in connection with biometric access technologies, and is used for access control, creating aggregate data, personalization, or other business purposes. In each case, where consent is required by law, we will process this information only with appropriate consent.

WHEN YOU ACCESS OR USE OUR DIGITAL SERVICES

When you use our online or in-venue Digital Services, we automatically collect and process Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Services, such as keeping you logged in, delivering pages, etc.

In addition to Device/Network Data, we may also collect and process Contact Data, Identity Data and Inference Data that we collect, create, and/or receive (including through the use of cookies and similar technologies). We typically use this data as necessary in connection with certain legitimate business interests, such as:

- ensuring the security of our websites, mobile applications and other technology systems; and
- analyzing the use of our Services, including navigation patterns, clicks, etc. to help understand and make improvements to the Services.

Some Digital Services may, with your consent, process Location Data. We use this data, together with Inference Data, and Device/Network Data in order to determine your proximity to portions of our Events and Venues, provide directions and contextual information to you, and other features that require the use of location. We may also use this information in connection with our legitimate business interests, such as, creating aggregate information about users' location and patterns, which we use to help improve our Events and Venues and other Services. Note, Location Data may be required in order for you to use certain Features of our Digital Services.

We may also process Identity Data, Contact Data, and User Content if you interact with or identify us, or relevant promoters, artists, sponsors or other partners on social media platforms. Additionally, Personal Data processed when you Submit Information to us or Complete a Purchase or Transaction (among others) may involve processing through Digital Services.

COOKIES AND OTHER TRACKING TECHNOLOGIES

We use cookies and similar technologies on our Digital Services. These technologies can be used to collect or create Identity Data, Device/Network Data, Contact Data, or Inference Data.

Third parties may be allowed to view, edit, or set their own cookies or place web beacons on our websites. Cookies and web beacons allow us and third parties to distinguish you from other users of our websites, and some of these technologies can be used by us and/or our third party partners to identify you across platforms, devices, sites, and services. Third parties may engage in targeted advertising using this data.

We and authorized third parties may use cookies and similar technologies for the following purposes:

- for "essential" or "functional" purposes, such as to enable certain features of our Digital Services (for example, to allow a customer to maintain a basket when they are shopping at an online store);
- for "analytics" purposes, such as to analyze the traffic to and on our Digital Services (for example, we can count how many people have looked at a specific page, or see how visitors move around the website when they use it, what website they visited prior to visiting our website, and use this information to understand user behaviors and improve the design and functionality of the website); and
- for "retargeting" or similar advertising or commercial purposes, such as:
- for social media integration e.g. via third-party social media cookies, or when you share information using a social media sharing button or "like" button on our Services or you link your account or engage with our content on or through a social networking website such as Facebook or Twitter; and
- to collect information about your preferences and demographics to help target advertisements which are more likely to be of interest to you using behavioral advertising;
- to allow us to carry out retargeting (this includes, for example, when advertisements are presented to you for products or services which you have previously looked at on a website but have not purchased).

The use of these technologies by third parties may be subject to their own privacy policies and is not covered by this Policy, except as required by law.

WHEN YOU ENTER A CONTEST OR OTHER PROMOTION

We collect and process Identity Data, Contact Data, and User Content as necessary to process your request to enter the contest, or take part in a promotion, notify you if you have won or to process delivery of a prize or for other related purposes.

In addition, we may process this information in connection with our legitimate business interests, such as:

- verifying your identity for authentication and security purposes (in which case we may process Government ID Data to complete verification); and
- helping us to ensure our customers are genuine and to prevent fraud.

Note, if you win a contest/sweepstakes, we may publicly post some of your data on our website or mobile application (for example acceptance of a prize may also require you to allow us to post publicly some of your Personal Data such as on a winners' page). Where required by law, your information will not be posted without your consent. We use this Identity Data, Contact Data, and User Content information for commercial purposes, unless prohibited by law.

WHEN YOU CONTACT US OR SUBMIT INFORMATION TO US

We collect and process Identity Data, Contact Data, and User Content as necessary to address your request, fulfill the business purpose for which that information was provided, or for other related purposes. This information is primarily used to respond to your request, and to otherwise fulfill our contract or communicate with you, as appropriate.

Additionally where you consent or if otherwise permitted by law, we may send you marketing communications as described further below, and use this information for commercial purposes.

FEEDBACK AND SURVEYS

We generally process Identity Data, Contact Data, Inference Data, and User Content collected in connection with guest surveys or questionnaires. We generally process this Personal Data as necessary to respond to guest requests/concerns, create aggregate analytics regarding guest satisfaction.

EMPLOYMENT & SERVICE PROVIDER APPLICATIONS

We may process Identity Data, Contact Data, Government ID Data, Protected Category Data, Biographical Data, Inference Data, User Content, Financial Data, and Health Data (which may include Special Category Data) in connection with your application to be a vendor, volunteer, employee, or otherwise join or support our team. We process this Personal Data primarily in connection with the assessment and creation of the personnel relationship, and to the extent permitted by applicable law, or with your consent or where authorized by law, and subject to your rights and choices, we may process Personal Data in accordance with our legitimate business interests, as follows:

- We may use your Contact Data as necessary to process your application, contact you regarding this or other future application/vendor/work opportunities, or similar matters.
- The assessment of your application may involve the creation and processing of Inference Data based on your Identity Data, Contact Data, Biographical Data, and User Content in order to evaluate your prospective engagement, assess skills alignment, qualifications, and similar matters. Inference Data does not include Special Category Data, Health Data, or Special Category Data.

HOW WE PROCESS PERSONAL DATA FOR BUSINESS PURPOSES

We and our Service Providers process Personal Data we hold for numerous business purposes, depending on the context of collection, your rights and choices, and our legitimate business interests. For example, we generally process Personal Data:

- In connection with providing our Services, supporting events you attend, and fulfilling our contractual obligations to you
- To maintain the quality and stability of, and generally improve, our Services To secure our Events, Venues and Services, and prevent fraud
- To personalize the Services, and in connection with marketing and advertising, including behavioral advertising
- To compile aggregate statistics regarding the use of the Services, and for research and market analysis
- To comply with the law, and for other purposes in the public interest

SERVICE PROVISION AND CONTRACTUAL OBLIGATIONS

We process any Personal Data as is necessary to provide our Services, to provide you with the products and services you purchase or request, authenticate users and their rights to access the Services, as otherwise necessary to fulfill our contractual obligations to you, and provide you with the information, features, and services you request. Additionally, we use information to authenticate your right to access our Events and Venues, deliver products and services, and for other related matters. Similarly, we may use Personal Data as necessary to audit compliance, and log or measure aspects of service delivery (e.g. to document ad impressions).

INTERNAL PROCESSING AND SERVICE IMPROVEMENT

We may use any Personal Data we process through our Services as necessary in connection with our legitimate business interests in improving the design of our Service, understanding how our Services are used or function, for customer service purposes, in connection with logs and metadata relating to service use, and for debugging and similar purposes relating our identification of errors and improving the stability of the Service. Additionally, we may use Personal Data to understand what parts of our Service are most relevant to Users, how Users interact with various aspects of our Service, and how our Service performs.

SECURITY AND INCIDENT DETECTION

Whether online or off, we work to ensure that our Services are secure. We may process any Personal Data we collect in connection with our legitimate business interest in ensuring that our Events and Venue are secure, identify and prevent crime, prevent fraud, and ensure the safety of our guests. Similarly, we process Personal Data on our Digital Services as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns and characteristics, maintain and analyze logs and process similar Personal Data in connection with our information security activities.

COMPLIANCE, HEALTH, SAFETY, PUBLIC INTEREST

We may also process any Personal Data as necessary to comply with our legal obligations, such as where you exercise your rights under data protection law and make requests, for the establishment and defense of legal claims, or where we must comply with our legal obligations, lawful requests from government or law enforcement officials, and as may be required to meet national security or law enforcement requirements or prevent illegal activity. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, but each to the extent allowed under applicable law. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

AGGREGATED DATA

We process Personal Data about our customers and users in order to identify trends (to create aggregated and anonymized data about our customers/users, buying and spending habits, use of our Services, and other similar information ("Aggregated Data"). We may pass Aggregated Data to the third parties referred to in the section below to give them a better understanding of our business and to bring you a better service. Aggregated Data will not contain information from which you may be personally identified.

PERSONALIZATION

We process certain Personal Data as necessary in connection with our legitimate business interest in personalizing our Digital Services. For example, aspects of the Digital Services may be customized to you so that it displays your name and other appearance or display preferences, to display content that you have interacted with in the past, or to display content that we think may be of interest to you based on your interactions with our Digital Services and other content. This processing may involve the creation and use of Inference Data relating to your preferences.

OTHER BUSINESS PURPOSES

If we process Personal Data in connection with our Service in a way not described in this Privacy Notice, this Privacy Notice will still apply generally (e.g. with respect to your rights and choices) unless otherwise stated at collection. We will process such information in accordance with the notice provided at the time of collection or in a manner that is necessary and proportionate to achieve the operational purpose for which the personal information was collected or processed or for another operational purpose that is compatible with the context in which the personal information was collected.

MARKETING COMMUNICATIONS

Consistent with our legitimate business interests, we (or if appropriate, certain third-parties) may send you marketing and promotional communications if you sign up for such communications or purchase products or services from us. For example, we may process Contact Data and Identity Data when you opt-in to receive marketing communications via email or SMS. Where allowed, we may also send you these communications without opt-in, for example, you may receive email marketing communications if you register for our Services or for a promotion, or in connection with your communications with or submission of User Content to us. Similarly, we may also collect Device/Network Data and Contact Data so that we can determine whether you have opened an email or otherwise interacted with our communications, and we may generate Inference Data based on these interactions.

TARGETED ADVERTISING

We, and certain third parties operating on or through our Services, may engage in targeted advertising. This form of advertising includes various parties and services providers, including third party data controllers, engaged in the processing of Personal Data in connection with advertising. These parties may be able to identify you across sites, devices, and over time. These third parties may augment your profile with demographic and other Inference Data derived from these observations, and may also track whether you view, interact with, or how often you have seen an ad, or whether you complete a purchase for a good or services you were shown in an advertisement. We generally use targeted advertising for the purpose of marketing our Services and to send marketing communications, including by creating custom marketing audiences on third-party websites (such as Facebook).

DATA SALES

We do not sell your personal data.

HOW WE SHARE PERSONAL DATA

Service Providers

In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other legitimate business interests and business purposes, we may share your Personal Data with service providers who provide certain services or process data on our behalf. For example, we may use cloud-based hosting providers to host our Service or may disclose information as part of our own internal operations or other business purposes (which may include the legitimate interests and business purposes of the Service Provider themselves).

See the California Rights & Disclosures section for a list of categories of Personal Data disclosed for Business Purposes.

Social Media Platforms

In order to improve personalization, deliver more relevant advertisements, and develop better products and services, we may share certain Personal Data with current or future affiliated entities and trusted third parties for marketing, advertising, or other commercial purposes, and we may allow third parties (such as Facebook and social media advertisers, ad exchanges, data management platforms, or ad servers) to operate on our Services and process data for targeted advertising. These transfers may be made for commercial purposes.

Additionally, If you use any social media plugin, API, or other similar feature, use an event hashtag or similar link, or otherwise interact with us or our Services via social media, we may make your post available on our Services or to the general public. We may share, rebroadcast, or redisplay Personal Data or other information in the post to the extent permitted by the relevant social media service.

Successors

Your Personal Data may be shared if we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Lawful Recipients

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, in the vital interests of us or any person, or in such other circumstances as may be required or permitted by law. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Data as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Data to such parties.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

If you are located outside the US, your Personal Data may be transferred to and/or processed in a location outside of the European Economic Area (EEA).

Your Personal Data may also be processed by staff operating in the United States or outside the EEA working for us or third-party data processors. Such staff may be engaged in, among other things, the provision of our Services to you, the processing of transactions and/or the provision of support services.

Some countries outside the EEA do not have laws that protect your privacy rights as extensively as those in the EEA. However, if we do transfer your Personal Data to other territories, we will put in place appropriate safeguards to ensure that your Personal Data are properly protected and processed only in accordance with this Policy. We may transfer Personal Data from the EEA to the US using the EU standard contractual clauses, the EU-U.S. Privacy Shield Program, under Binding Corporate Rules, or other lawful mechanisms. You can obtain more information about the safeguards we put in place by contacting us using the information below.

HOW WE RETAIN YOUR PERSONAL DATA

We retain Personal Data for so long as it, in our discretion, remains relevant to its purpose, and in any event, for so long as is required by law. This period may be different if required by law, or if we need to retain data in order to respond to claims, to protect our rights or the rights of a third party. We will review retention periods periodically and may sometimes pseudonymize or anonymize data held for longer periods, if appropriate.

YOUR RIGHTS & CHOICES

You may have certain rights and choices regarding the Personal Data we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law.

YOUR RIGHTS

To the extent applicable law grants you the right to do so, and subject to any necessary verification, you may have the right to:

- request that we provide you with a copy of the Personal Data which we hold about you;
- request that we update any of your Personal Data which are inaccurate or incomplete;
- request that we delete any of your Personal Data which we are holding; or
- request that we provide your Personal Data to you or a third-party provider of services in a structured, commonly-used and machine-readable format.

To submit a request, you may contact our office. Please include your name, email address and postal address with your request, and we may require proof of your identity to complete your request.

YOUR CHOICES

MARKETING COMMUNICATIONS.

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email or by adjusting the push message settings for the mobile application, or for other communications, by contacting using the information below. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

WITHDRAWING YOUR CONSENT/OPT-OUT

Where we are processing your Personal Data based on your consent, you may change your mind and withdraw your consent at any time. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out.

LOCATION PREFERENCES

You may control or limit location data that we collect through our Services by changing your preferences in your device's location services preferences menu, or through your choices regarding the use of Bluetooth, WiFi, and other network interfaces you may use to interact with our Services. Note, general location data may still be collected if you opt out of specific location services.

DO-NOT-TRACK

Our Services do not respond to your browser's do-not-track request. If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu. You must opt out of third-party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit Google Analytics Terms of Use, the Google Policy, or Google Analytics Opt-out.

ADVERTISING

You may opt out or withdraw your consent to behavioral advertising. In some cases, we may be able to process third party opt-out requests directly (e.g. when you click the "do not sell my info" link), however in some cases, you must opt out of third party services directly via the third party. For example, to opt out of Google's use of cookies, visit Google's Ads Setting. To opt out from Facebook Custom Audience Pixel, visit their customer support page. To learn more about how to opt out of Twitter's use of audience pixels, visit the Twitter help page. If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonppii.asp. You can limit or opt out of our processing for behavioral advertising by contacting us.

REGIONAL RIGHTS

See the California Rights section for additional information regarding data sale opt-out verification, and your California privacy rights.

Residents and others in the EU may have rights under EU law. See the EU Rights section for additional information.

HOW WE PROTECT YOUR PERSONAL DATA

We use industry standard technical and organizational security measures to protect your Personal Data. We cannot guarantee the security of your Personal Data when you transmit it to us, and any such transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access one of our Services, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

THIRD PARTY WEBSITES AND MOBILE APPLICATIONS

We are not responsible for the privacy policies, content or security of any linked third-party websites or mobile applications. We recommend that you check the privacy and security policies of each and every website and mobile application that you visit.

In some instances, a third party may operate or host a contest/sweepstakes on our websites or mobile applications and collect your Personal Data. In those cases, where we are not the operator or host of the contest/sweepstakes, we have no control over the Personal Data collected and accordingly urge you to review the third party's privacy policy before participating.

MINORS

Our Services are neither directed at nor intended for use by children under the age of 13 in the US, or under the age of 13 to 16 in the EU, depending on the local jurisdiction. We generally collect information relating to minors only from parents or with parental consent and do not knowingly collect Personal Data from such minors directly. If we learn that we have inadvertently done so, we will promptly delete such Personal Data if required by law. Do not access or use the Services if you are not of the age of majority in your jurisdiction unless you have the consent of your parent or guardian.

CHANGES TO OUR POLICY

We reserve the right to change our Policy from time to time. Any such changes will be posted on this page so that we can keep you informed about how we process your Personal Data. We recommend that you consult this page frequently. Your continued use of our Services shall constitute your acceptance of any revised Policy.

ADDITIONAL RIGHTS AND DISCLOSURES: EU/EEA, SWITZERLAND, CAYMAN ISLANDS, ETC.

YOUR RIGHTS

Under the GDPR and analogous legislation, you may have the following rights in addition to those set forth in the Rights & Choices section above, subject to your submission of an appropriately verified request. You may exercise any of these rights by sending an email to info@thevelodrome.com

Access

You may have a right to know what information we collect, use, disclose, or sell, and you may have the right to receive a list of that Personal Data and a list of the third parties (or categories of third parties) with whom we have received or shared Personal Data, to the extent required and permitted by law.

Rectification

You may correct any Personal Data that we hold about you to the extent required and permitted by law.

Delete

To the extent required by applicable law, you may request that we delete your Personal Data from our systems. We may delete your data entirely, or we may anonymize or aggregate your information such that it no longer reasonably identifies you. Contact us as part of your request to determine how your Personal Data will be erased in connection with your request.

Data Export

To the extent required by applicable law, we will send you a copy of your Personal Data in a common portable format of our choice.

Objection

You may have the right under applicable law to object to our processing of your Personal Data that we undertake without your consent in connection with our legitimate business interests (including any processing specified as such, or processed under this Policy for a Business Purpose). Note that we may not be required to cease, or limit processing based solely on that objection, and we may continue processing where our interests in processing are balanced against individuals' privacy interests. You may also object to processing for direct marketing purposes. We will cease processing upon your objection to such processing.

Regulator Contact

You may have the right to file a complaint with regulators about our processing of Personal Data. To do so, please contact your local data protection or consumer protection authority.

ADDITIONAL RIGHTS AND DISCLOSURES: CALIFORNIA

YOUR CALIFORNIA PRIVACY RIGHTS

Under the California Consumer Privacy Act ("CCPA") and other California laws, California residents may have the following rights in addition to those set forth in the Rights & Choices section above, subject to your submission of an appropriately verified request (see below for verification requirements):

Right to Know

You may request the any of following, for the 12 month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.

Right to Delete

You have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law.

Right to Non-Discrimination

You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.

Direct Marketing

You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

Opt-Out of Sale

We do not sell your personal data.

Minors'

To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16, those minors between the age of 13 and 16 must opt in to any sales of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales of personal information (as defined under CCPA). All minors have the right to opt-out later at any time.

Minors under age 13 may have other rights under the Children’s Online Privacy Protection Act (“COPPA”).

Minors’ User Content

Individuals under the age of 18 in California can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion you can contact us. We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

VERIFICATION OF REQUESTS

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you provide the email address we have on file for you (and verify that you can access that email account) as well as an address, phone number, or other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

DATA PROCESSING

Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for “business purposes” the following categories of Personal Data: Identity Data, Contact Data, Location Data, Device/Network Data, Commercial Data, Inference Data, Financial Data, Audio/Visual Data, Biometric Data, Health Data, Biographical Data, Government ID Data, and User Content.

Categories of Personal Data Sold

For purposes of the CCPA, we may “sell” the following categories of Personal Data processed through our Services: Identity Data, Contact Data, Location Data, Device/Network Data, Commercial Data, Inference Data, and User Content.

Right to Know

Audio/ Visual Data

Category of Sources

- From you; Automatic collection; Service Providers

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

Service Providers; Successors; Lawful Recipients

Biometric Data

Category of Sources

- From you; Service Providers

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

- Service Providers; Successors; Lawful Recipients

Commercial Data

Category of Sources

- From you; Automatic collection; Service providers; Promoters and event partners; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising; Data Sales

Category of Recipients

- Service Providers; Promoters, Data Aggregators; Successors; Lawful Recipients

Contact Data

Category of Sources

- From you; Automatic collection; Service providers; Aggregators and advertisers; Social media companies; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising; Data Sales

Category of Recipients

- Service Providers; Social Media Platforms; Data Aggregators; Successors; Lawful Recipients

Device/Network Data

Category of Sources

- Automatic collection; Service providers; Promoters and event partners; Aggregators and advertisers; Social media companies; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising; Data Sales

Category of Recipients

- Service Providers; Social Media Platforms; Data Aggregators; Successors; Lawful Recipients

Employment Data

Category of Sources

- From you; Automatic collection; Service Providers; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

- Service Providers; Lawful Recipients

Financial Data

Category of Sources

- From you; Automatic collection; Service Providers; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Targeted advertising

Category of Recipients

- Service Providers; Successors; Lawful Recipients

Government ID Data

Category of Sources

- From you; Automatic collection; Service Providers; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

- Service Providers; Successors; Lawful Recipients

Health Data

Category of Sources

- From you; Service Providers

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

- Service Providers; Successors; Lawful Recipients

Identity Data

Category of Sources

- From you; Automatic collection; Service providers; Aggregators and advertisers; Social media companies; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising; Data Sales

Category of Recipients

- Service Providers; Social Media Platforms; Data Aggregators; Successors; Lawful Recipients

Inference Data

Category of Sources

- Automatic collection; Service providers; Promoters and event partners; Aggregators and advertisers; Social media companies; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising; Data Sales

Category of Recipients

- Service Providers; Social Media Platforms; Data Aggregators; Successors; Lawful Recipients

Inference Data

Category of Sources

- From you; Automatic collection; Service providers; Aggregators and advertisers; Social media companies; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising;

Category of Recipients

- Service Providers; Social Media Platforms; Data Aggregators; Successors; Lawful Recipients

Location Data

Category of Sources

- From you; Automatic Collection; Service Providers

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising; Data Sales

Category of Recipients

- Service Providers; Social Media Platforms; Promoters, Artists, Sponsors; Data Aggregators; Successors; Lawful Recipients

Protected Category Data

Category of Sources

- From you; Automatic collection; Service Providers; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

- Service Providers; Successors; Lawful Recipients

Special Category Data

Category of Sources

- From you; Automatic collection; Service Providers; Data we create/infer

Business Purposes

- Service Provision and Contractual Obligations; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Other Business Purposes

Commercial Purposes

- None

Category of Recipients

- Service Providers; Successors; Lawful Recipients

User Content

Category of Sources

- From you; Service providers; Promoters and event partners; Social media companies

Business Purposes

- Service Provision and Contractual Obligations; Internal Processing and Service Improvement; Security and Incident Detection; Compliance, health, safety, public interest; Aggregated data; Personalization; Other Business Purposes

Commercial Purposes

- Personalization & Customer Profiles; Marketing Communications; Targeted advertising;

Category of Recipients

- Service Providers; Social Media Platforms; Data Aggregators; Successors; Lawful Recipients