

CLUBSPORTAL, LLC

WEBSITE PRIVACY POLICY

CLUBSPORTAL, LLC, A VIRGINIA LIMITED LIABILITY COMPANY (“COMPANY”, “WE” OR “US”), IS COMMITTED TO PROTECTING THE PRIVACY OF YOUR INFORMATION.

THIS PRIVACY POLICY OUTLINES SOME OF COMPANY’S INFORMATION DATA COLLECTION AND OTHER PRACTICES. COMPANY SUPPORTS THE EFFORT TO BUILD USERS’ TRUST AND CONFIDENCE IN THE INTERNET BY PROMOTING THESE DATA COLLECTION AND OTHER PRACTICES.

1. WEBSITES COVERED

This Privacy Policy covers the information practices of Websites that link to this Privacy Policy. When sites are posted by Company, the site will link to this Privacy Policy, and this Privacy Policy applies. When sites are posted by third parties, the privacy statement of the third party applies, and this Privacy Policy does not apply.

Company’s Website may contain links to other Websites. Company is not responsible for the information practices or the content of such other Websites. Company encourages you to review the privacy statements of other Websites to understand their information practices.

2. PERSONAL INFORMATION COLLECTED

Company offers the ClubSportal Software and System and related services, goods and/or items that are collectively referred to as the “Service.” Company collects information from individuals who visit the Company’s Website (“Visitors”) and individuals who register to use the Service (“Customers”).

When expressing an interest in obtaining additional information about the Service or registering to use the Service, Company requires you to provide the Company with contact information, such as name, company name, address, phone number, and e-mail address (“Required Contact Information”). When purchasing the Service, Company requires you to provide the Company with financial qualification and billing information, such as billing name and address, credit card number, and the number of employees within the organization that will be using the Service (“Billing Information”). Company may also ask you to provide additional information, such as company annual revenues, number of employees, or industry (“Optional Information”). Required Contact Information, Billing Information, and Optional Information are referred to collectively as “Data About Company Customers.”

As you navigate the Company’s Website, Company may also collect information through the use of commonly used information-gathering tools, such as cookies and web beacons (“Web Site Navigational Information”). Web Site Navigational Information includes standard information from your web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the Company’s Website (such as the web pages viewed and the links clicked).

3. USE OF INFORMATION COLLECTED

The Company uses Data About Company Customers to perform the services requested. For example, if you fill out a “Contact Me” Web form, the Company will use the information provided to contact you about your interest in the Service.

The Company may also use Data About Company Customers for marketing purposes. For example, the Company may use information you provide to contact you to further discuss your interest in Company, the Service, and to send you information regarding the Company and its partners, such as information about promotions or events.

Company uses credit card information solely to check the financial qualifications of prospective Customers and to collect payment for the Service.

Company uses Web Site Navigational Information to operate and improve the Company’s Website. The Company may also use Web Site Navigational Information in combination with Data About Company Customers to provide personalized information about the Company.

4. WEB SITE NAVIGATIONAL INFORMATION

Company uses commonly used information-gathering tools, such as cookies and web beacons, to collect information as you navigate the Company’s Website (“Web Site Navigational Information”). This section describes the types of Web Site Navigational Information the Company may collect and how the Company may use this information.

4.1 Cookies

Company uses cookies to make interactions with the Company’s Website easy and meaningful. When you visit the Company’s Website, Company’s servers send a cookie to your computer. Standing alone, cookies do not personally identify you. They merely recognize your web browser. Unless you choose to identify yourself to Company, either by responding to a promotional offer, opening an account, or filling out a web form (such as a “Contact Me” or a “30-Day Free Trial” web form), you remain anonymous to the Company.

There are two types of cookies: session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer.

If you have chosen to identify yourself to Company, the Company uses session cookies containing encrypted information to allow the Company to uniquely identify you. Each time you log into the Service, a session cookie containing an encrypted, unique identifier that is tied to your account is placed in your browser. These session cookies allow the Company to uniquely identify you when you are logged into the Service and to process your online transactions and requests. Session cookies are required to use the Service.

Company uses persistent cookies that only the Company can read and use to identify browsers that have previously visited the Company’s Website. When you purchase the Service or provide

the Company with personal information, a unique identifier is assigned to you. This unique identifier is associated with a persistent cookie that the Company places on your web browser. The Company is especially careful about the security and confidentiality of the information stored in persistent cookies. For example, the Company does not store account numbers or passwords in persistent cookies. If you disable your web browser's ability to accept cookies, you will be able to navigate the Company's Website, but you will not be able to successfully use the Service.

Company may use information from session and persistent cookies in combination with Data About Company Customers to provide you with information about the Company and the Service.

4.2 Web Beacons

Company uses web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Website and interaction with e-mails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site tied to the web beacon, and a description of a Web site tied to the web beacon. For example, Company may place web beacons in marketing e-mails that notify the Company when you click on a link in the e-mail that directs you to the Company's Website. Company uses web beacons to operate and improve the Company's Website and e-mail communications. Company may use information from web beacons in combination with Data About Company Customers to provide you with information about the Company and the Service.

4.3 IP Addresses

When you visit the Company's Website, the Company collects your Internet Protocol ("IP") addresses to track and aggregate non-personally identifiable information. For example, Company uses IP addresses to monitor the regions from which Customers and Visitors navigate the Company's Website.

Company also collects IP addresses from Customers when they log into the Service as part of the Company's "Identity Confirmation" and "IP Range Restrictions" security features.

4.4 Third-Party Cookies

From time-to-time, Company engages third parties to track and analyze non-personally identifiable usage and volume statistical information from individuals who visit the Company's Website. Company may also use other third-party cookies to track the performance of Company advertisements. The information provided to third parties does not include personal information, but this information may be re-associated with personal information after the Company receives it. This Privacy Policy does not cover the use of third-party cookies.

5. PUBLIC FORUMS, REFER A FRIEND, AND CUSTOMER TESTIMONIALS

Company may provide bulletin boards, blogs, or chat rooms on the Company's Website. Any personally identifiable information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages.

Company is not responsible for the personally identifiable information you choose to submit in these forums.

Customers and Visitors may elect to use the Company's referral service to inform friends about the Company's Website. When using the referral service, the Company requests the friend's name and e-mail address. Company will automatically send the friend a one-time e-mail inviting him or her to visit the Company's Website. Company does not store this information.

Company posts a list of Customers and testimonials on the Company's Website that contain information such as Customer names and titles. Company obtains the consent of each Customer prior to posting any information on such a list or posting testimonials.

6. SHARING OF INFORMATION COLLECTED

Company may share Data About Company Customers with the Company's agents so that these agents can contact Customers and Visitors who have provided contact information on our behalf. Company may also share Data About Company Customers with the Company's agents to ensure the quality of information provided. Company does not share, sell, rent, or trade personally identifiable information with third parties for their promotional purposes.

Company uses a third-party intermediary to manage credit card processing. This intermediary is not permitted to store, retain, or use Billing Information except for the sole purpose of credit card processing on the Company's behalf.

Company reserves the right to disclose personally identifiable information of the Company's Customers or Visitors if required by law or if the Company reasonably believes that disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

7. COMMUNICATIONS PREFERENCES

Company offers Customers and Visitors who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of the Company's marketing e-mails. Additionally, you may send a request specifying your communications preferences to ybogdanov@club-sportal.com. Customers cannot opt out of receiving transactional e-mails related to their account with Company or the Service.

8. CORRECTING AND UPDATING YOUR INFORMATION

Customers may update or change their registration information by editing their user or organization record. To update a user profile, please log in to <http://www.club-sportal.com> with your Company user name and password and click "My Profile." To discontinue your account and to have information you maintained in the Service returned to you, please e-mail ybogdanov@club-sportal.com. Requests to access, change, or delete your information will be handled within 30 days.

9. CUSTOMER DATA

Company Customers use the Service to host data and information (“Customer Data”). Company will not review, share, distribute, or reference any such Customer Data except as provided in the Company’s license agreement with Customer, in Company’s Website Terms of Use or in the Company’s Policies related to the Website or Service, or as may be required by law. Individual records of Customer Data may be viewed or accessed only for the purpose of resolving a problem, support issues, or suspected violation of the Company’s license agreement with Customer, in Company’s Website Terms of Use or in the Company’s Policies related to the Website or Service, or as may be required by law. Customers are responsible for maintaining the security and confidentiality of their Company user names and passwords.

10. SECURITY

Company uses robust security measures to protect Customer Data from unauthorized access, maintain data accuracy, and help ensure the appropriate use of Customer Data. These technologies help ensure that Customer Data is safe, secure, and only available to the Customer to whom the information belongs and those to whom the Customer has granted access. Company also implements an advanced security method based on dynamic data and encoded session identifications, and the Company hosts its Websites in a secure server environment that uses firewalls and other advanced technology to prevent interference or access from outside intruders. Company also offers enhanced security features within the Service that permit Customers to configure security settings to the level they deem necessary.

Because the Company uses the Service to maintain Data about Company Customers, this information is secured in the same manner as described above for Customer Data.

11. CHANGES TO THIS PRIVACY STATEMENT

Company reserves the right to change this Privacy Policy. Company will provide notification of the material changes to this Privacy Policy through the Company’s Website at least thirty (30) business days prior to the change taking effect.

12. CONTACTING US

Questions regarding this Privacy Policy or the information practices of the Company’s Website should be directed to Company’s Privacy Officer by phone at +1 703 898 9066 or email to ybogdanov@club-sportal.com.

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