

× PARALOOP

PRIVACY POLICY & DATA PROTECTION NOTICE

Effective Date: February 21, 2026 · Version 1.0

qmnty.4playglobal.com · paraloop.4playglobal.com · privacy@4playglobal.com

ENTITY	PLATFORM	EFFECTIVE	JURISDICTION
4Play Global LLC	Paraloop / QMNTY	February 21, 2026	New York, USA
DATA OFFICER	CONTACT	RESPONSE SLA	APPLICABLE LAW
Khalid J. (KJ)	privacy@4playglobal.com	30 Business Days	CCPA · GDPR · NY SHIELD

1. Introduction & Scope

4Play Global LLC ('4Play Global,' 'Company,' 'we,' 'us,' or 'our') operates the Paraloop platform, formerly known as QMNTY, accessible at paraloop.4playglobal.com and qmnty.4playglobal.com (collectively, the 'Platform'). This Privacy Policy governs how we collect, use, store, share, and protect personal information across all 4Play Global products and services, including:

- Paraloop — The Operating System for the Athlete Economy (NIL marketplace, Athlete Cultural Index, fan engagement)
- Glazn — Influencer marketplace connecting creators and brands
- Culturvated Management — Artist and content creator management platform
- ClawdBot Nexus & The Salim Group — AI-powered agent automation systems
- All associated websites, mobile applications, APIs, and digital properties operated by 4Play Global

By accessing or using any 4Play Global platform or service, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy. If you do not agree, please discontinue use immediately.

This Policy applies to: users aged 13 and older (with parental consent required for ages 13–17); college and professional athletes who create profiles or participate in the NIL marketplace; brands, sponsors, and businesses that access our platform; content creators and influencers managed through Culturvated; and visitors to any 4Play Global digital property.

2. Information We Collect

We collect several categories of information to provide, improve, and personalize our services. The types of information collected depend on how you interact with our platforms.

2.1 Information You Provide Directly

- **Account Registration:** Name, email address, username, password (hashed), date of birth, profile photo, and biography
- **Athlete Profiles:** Sport, school/team affiliation, jersey number, career statistics, social media handles, NIL deal history, performance metrics, and agent contact information
- **Financial Information:** Payment details for transactions (processed through PCI-compliant third-party processors; we do not store full card numbers), bank account information for NIL payment disbursements, tax identification numbers (W-9/W-8 forms for U.S. earnings)
- **Communications:** Messages sent through our platform, support tickets, email correspondence, and feedback submissions
- **Content:** Photos, videos, social media posts, written content, and other media you upload or connect to our platform
- **Legal & Compliance:** Government-issued ID verification for age and identity confirmation (for NIL participants and financial transactions)

2.2 Information Collected Automatically

- **Device & Technical Data:** IP address, browser type and version, operating system, device identifiers, screen resolution, and language preferences
- **Usage Analytics:** Pages visited, features used, time spent, click-through paths, search queries, and interaction patterns with AI agent systems
- **Location Data:** General geographic location derived from IP address; precise location only if you grant explicit permission
- **Cookies & Tracking Technologies:** Session cookies, persistent cookies, pixel tags, and local storage (see Section 8 for full Cookie Policy)
- **AI Interaction Logs:** Prompts, commands, and responses generated through ClawdBot Nexus and The Salim Group agent systems

2.3 Information from Third Parties

- **Social Media Platforms:** Profile data, follower counts, engagement metrics, and public posts when you connect Instagram, TikTok, X (Twitter), YouTube, or other accounts
- **Sports Data Providers:** Athletic performance statistics, game records, and recruiting rankings from licensed sports data partners
- **Brand & Sponsor Partners:** Campaign performance data and deal terms shared by participating brands through our marketplace
- **Identity Verification Services:** Authentication data from KYC (Know Your Customer) partners

3. How We Use Your Information

3.1 Core Platform Operations

- Creating, maintaining, and personalizing your account and athlete profile
- Computing the Athlete Cultural Index (ACI) — our proprietary real-time athlete valuation metric
- Facilitating NIL deal matching, negotiation, and contract execution between athletes and brands
- Processing payments, disbursements, and financial reporting for completed transactions
- Operating ClawdBot Nexus and The Salim Group AI agent systems to automate content, data, and workflow tasks on your behalf

3.2 Communications & Marketing

- Sending transactional communications (receipts, deal confirmations, platform alerts)

- Delivering newsletters, product updates, and promotional content (opt-out available at any time)
- Notifying you of new brand partnership opportunities, event invitations, and platform features

3.3 Analytics & Product Improvement

- Analyzing aggregated usage data to improve platform features, fix bugs, and optimize user experience
- Training and improving our AI models, including The Salim Group agents, using anonymized interaction data
- Conducting market research to better serve athletes, brands, and creators in the cultural economy

3.4 Legal & Safety

- Verifying identity and preventing fraud, money laundering, and unauthorized access
- Complying with applicable laws including NCAA NIL regulations, IRS reporting requirements, CCPA, GDPR, and New York SHIELD Act
- Enforcing our Terms of Service and protecting the rights, property, and safety of our users and the company

We do not sell your personal information to third parties for their direct marketing purposes. Period.

4. How We Share Your Information

We share personal information only in the circumstances described below. We require all third-party recipients to maintain data protection standards equivalent to or exceeding our own.

4.1 With Your Consent

When you connect your social media accounts, authorize brand partnerships, or grant explicit permissions for data sharing, we process that sharing under your direct consent. You may withdraw consent at any time through your account settings.

4.2 With Service Providers (Data Processors)

We share data with carefully vetted service providers who process data on our behalf, including:

- Cloud infrastructure and hosting providers (data stored in US-based data centers)
- Payment processors (Stripe, Plaid) — subject to PCI DSS compliance
- Identity verification services (KYC/AML compliance partners)
- Email and communication providers
- Analytics and performance monitoring tools
- AI model providers powering The Salim Group agent systems

4.3 With Brands & Sponsors (Platform Participants)

When you participate in NIL deals or brand campaigns through Paraloop or Glazn, relevant profile information — including your ACI score, social metrics, content samples, and agreed deal terms — is shared with participating brands. You control which opportunities to pursue, and no data is shared without your action.

4.4 For Legal Compliance

We may disclose information when required by law, court order, subpoena, or regulatory request; to prevent fraud or imminent harm; or to protect the legal rights of 4Play Global, our users, or the public.

4.5 Business Transfers

In the event of a merger, acquisition, investment round, or sale of substantially all assets, user information may be transferred as part of the transaction. We will provide notice prior to any such transfer and ensure the receiving party maintains privacy protections consistent with this Policy.

5. Athlete & NIL-Specific Privacy Provisions

As a platform purpose-built for the athlete economy, we recognize the unique privacy considerations facing student-athletes and professional players. The following provisions apply specifically to Paraloop's NIL marketplace:

5.1 Athlete Cultural Index (ACI)

Your ACI score is computed using a proprietary algorithm incorporating social engagement, athletic performance, market demand signals, and cultural relevance metrics. The ACI is:

- Visible to you in your dashboard at all times
- Shared with brands only when you actively pursue or accept a partnership opportunity
- Not disclosed to your educational institution, athletic association, or coaches without your explicit consent
- Recalculated in real time; historical ACI records are retained for 24 months

5.2 NCAA & Institutional Compliance

4Play Global is designed to support compliance with applicable NIL regulations. We do not share athlete data with NCAA bodies, conference offices, or educational institutions for enforcement purposes. However, athletes remain responsible for understanding and complying with their institution's NIL policies.

5.3 Minor Athletes

We take seriously our responsibilities regarding minors. Athlete accounts for users under 18 require verified parental or guardian consent. Financial transactions involving minors require additional verification. We do not display the profiles of verified minor athletes publicly without enhanced consent procedures.

6. AI Systems, ClawdBot Nexus & The Salim Group

4Play Global operates advanced AI-powered agent systems, including ClawdBot Nexus and The Salim Group (a personified multi-agent crew of AI subagents). The following policies govern how these systems interact with your data:

6.1 Data Used by AI Agents

- AI agents process your directives, platform data, and connected third-party data to complete assigned tasks
- Agent interaction logs (commands issued, tasks completed, outputs generated) are stored for 90 days for debugging, quality assurance, and service improvement
- Agents do not independently access financial account credentials, store payment information, or make transactions without explicit user authorization per session

6.2 AI Model Training

We may use aggregated, anonymized interaction data with AI agents to improve our models. We do not use identifiable personal information to train third-party foundational AI models without your explicit consent. You may opt out of AI training data usage in your privacy settings.

6.3 Human Oversight

All consequential AI agent actions — including financial transactions, public content publishing, and official communications — require human authorization. The Salim Group agents operate within defined permission boundaries set by Commander (account administrator) level users.

You are always in command. Our AI agents execute your directives; they do not act autonomously on consequential matters without your explicit approval.

7. Data Retention

We retain personal information for as long as necessary to provide our services and comply with legal obligations. Specific retention schedules:

DATA CATEGORY	RETENTION PERIOD	LEGAL BASIS
Account & Profile Data	Duration of account + 3 years	Contractual necessity
Financial Transaction Records	7 years post-transaction	IRS / tax compliance
NIL Deal Records	7 years post-execution	Legal compliance
AI Agent Interaction Logs	90 days	Service quality
Marketing Communications	Until opt-out + 30 days	Consent
Support Tickets	3 years from resolution	Legitimate interest
Security / Access Logs	12 months	Security compliance
Anonymized Analytics	Indefinite (non-personal)	Legitimate interest

8. Cookies & Tracking Technologies

We use cookies and similar tracking technologies to operate our platform, remember your preferences, analyze traffic, and support marketing. The following categories of cookies are used:

- **Strictly Necessary Cookies:** Required for the platform to function. These cannot be disabled. Examples: session authentication, security tokens, load balancing.
- **Performance & Analytics Cookies:** Help us understand how users interact with our platform. Data is aggregated and anonymized. Examples: page view tracking, feature usage analytics.
- **Functional Cookies:** Remember your preferences and personalization settings. Examples: language preference, timezone, dark mode selection.
- **Targeting & Marketing Cookies:** Used to deliver relevant advertising and measure campaign effectiveness. Only applied with your consent.

You can manage cookie preferences through your browser settings or via our Cookie Preference Center accessible at [cookie settings link]. Note that disabling certain cookies may limit platform functionality.

9. Your Privacy Rights

Depending on your location and applicable law, you have the following rights regarding your personal information:

9.1 Rights Under CCPA (California Residents)

- Right to Know: Request disclosure of the categories and specific pieces of personal information we've collected, the sources, business purposes for collection, and third parties with whom it is shared
- Right to Delete: Request deletion of personal information we've collected (subject to legal retention requirements)
- Right to Opt-Out of Sale: We do not sell personal information; this right is therefore automatically honored
- Right to Non-Discrimination: You will not receive inferior service for exercising your CCPA rights
- Right to Correct: Request correction of inaccurate personal information

9.2 Rights Under GDPR (EEA/UK Residents)

- Right of Access: Receive a copy of your personal data and information about how we process it
- Right to Rectification: Have inaccurate or incomplete data corrected
- Right to Erasure ('Right to be Forgotten'): Request deletion of your data under certain circumstances
- Right to Restrict Processing: Limit how we use your data in certain situations
- Right to Data Portability: Receive your data in a structured, machine-readable format
- Right to Object: Object to processing based on legitimate interests or for direct marketing
- Rights Related to Automated Decision Making: Request human review of significant decisions made by automated systems, including our AI agents

9.3 New York SHIELD Act (NY Residents)

In compliance with the New York Stop Hacks and Improve Electronic Data Security Act, we maintain reasonable security practices and will notify affected New York residents within the legally prescribed timeframe in the event of a qualifying security breach.

9.4 How to Exercise Your Rights

Submit privacy rights requests to:

- Email: privacy@4playglobal.com
- Subject line: PRIVACY REQUEST — [Your Request Type]
- Include: Your full name, email address associated with your account, and a description of your request

We will respond within 30 business days. Identity verification may be required before processing requests involving access to or deletion of personal data.

10. Data Security

4Play Global employs industry-standard and leading security measures to protect your personal information against unauthorized access, alteration, disclosure, or destruction:

- Encryption: All data in transit is encrypted using TLS 1.3. Data at rest is encrypted using AES-256.
- Access Controls: Role-based access control (RBAC) limits employee access to personal data on a strict need-to-know basis
- Multi-Factor Authentication: Required for all administrative access and recommended for user accounts
- Security Audits: Regular third-party penetration testing and vulnerability assessments
- Incident Response: A documented incident response plan with defined escalation procedures and breach notification timelines
- AI System Security: ClawdBot Nexus and The Salim Group operate within sandboxed environments with defined permission boundaries

No method of transmission over the internet or electronic storage is 100% secure. While we strive to protect your personal information, we cannot guarantee absolute security. In the event of a breach affecting your rights, we will notify you as required by applicable law.

11. Children's Privacy

Our platforms are not directed to children under the age of 13. We do not knowingly collect personal information from children under 13. If you are between 13 and 17 years of age, use of our platform requires verified parental or guardian consent.

If we become aware that we have collected personal information from a child under 13 without verifiable parental consent, we will take immediate steps to delete that information. Parents or guardians who believe their child has provided us with personal information without consent should contact privacy@4playglobal.com immediately.

Student-athletes who are minors participating in NIL activities must have a parent or legal guardian co-sign platform agreements. All financial transactions involving minors require guardian authorization.

12. Third-Party Links & Integrations

Our platform integrates with and links to third-party services including social media platforms, sports data providers, payment processors, and brand partner sites. This Privacy Policy does not apply to those third-party services. We encourage you to review the privacy policies of any third-party service you access through our platform.

Third-party integrations available through our platform include: Instagram, TikTok, X (Twitter), YouTube, Spotify, Stripe, Plaid, ESPN APIs, and others as announced. Each integration is governed by the respective platform's own terms and privacy practices.

13. International Data Transfers

4Play Global is headquartered in New York, USA. If you are located outside the United States, your information will be transferred to and processed in the United States, where data protection laws may differ from those in your country.

For users in the European Economic Area (EEA) or United Kingdom, we rely on the following legal mechanisms for international data transfers:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequacy decisions where applicable
- Binding Corporate Rules for intra-group transfers

14. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or business operations. When we make material changes:

- We will post the updated policy with a new effective date at the top of this document
- We will notify registered users via email at least 14 days before material changes take effect
- For significant changes affecting your rights, we may require affirmative acknowledgment before you can continue using the platform

Your continued use of our platform after the effective date of an updated Privacy Policy constitutes your acceptance of the changes. We encourage you to review this Policy periodically.

15. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please reach out through any of the following channels:

General Privacy	privacy@4playglobal.com
Data Rights Requests	privacy@4playglobal.com — Subject: PRIVACY REQUEST
Security Reports	security@4playglobal.com
Legal / Compliance	legal@4playglobal.com
Mailing Address	4Play Global LLC, New York, NY, United States
Platform URLs	qmnty.4playglobal.com · paraloop.4playglobal.com
Response Time	30 business days for privacy requests; 72 hours for security incidents

ACKNOWLEDGMENT & AUTHORIZATION

This Privacy Policy has been reviewed, approved, and issued by 4Play Global LLC on behalf of all Paraloop and associated platform operations.

Authorized By: Khalid J. (KJ) — Founder & CEO 4Play Global LLC	Effective Date: February 21, 2026 Version 1.0 — All Rights Reserved
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