



SEEDpath Privacy Policy

Welcome to SEEDpath, our website at www.seedpath.org (“website”) and SEEDpath our iOS and Android mobile applications (our “APP”) (collectively our “Platform”). At ABA World LLC we take the protection of your data very seriously, and in the below we explain what data we collect when you use our Platform and services and how it is used.

General Information

What is Personal Information?

Personal Information is any information relating to personal or material circumstances that relates to an individual. This may include, a name, date of birth, e-mail address, postal address, or telephone number but also online identifiers such as IP addresses or device ID`s.

What is processing?

"Processing" means any operation or set of operations which is performed upon Personal Information, whether or not by automatic means. The term is broad and covers virtually any handling of data.

Who is responsible for data processing?

The responsible party for data processing is ABA World LLC, a New York Domestic Limited-Liability Company (“ABA World”, “we”, “us”, or “our”).

If you have any questions or if you wish to exercise your rights, please contact us via email at metaworldedu@gmail.com.

What are the legal bases of processing?

As a responsible Company, we only process your Personal Information if at least one of the following applies:

- *For the fulfillment of contractual obligations*
 - The purposes of the data processing are primarily based on the service we provide.
- *Within the framework of our legitimate interests*

Where necessary, we process your data beyond the actual performance of the contract in order to safeguard legitimate interests of us or third parties. Examples are:

 - Ensuring IT security and IT operations,
 - Measures for business management and further development of our services,
 - Defense against third-party claims and enforcement of own claims.
- *Based on your consent*
 - Insofar as you have given us your consent to process Personal Information for certain purposes.

Data we collect automatically

Log data

Each time you visit our website, our system automatically records data from the visiting device and stores it in a so-called log file. Among other purely technical information, this includes both device information and IP address (identification of the user's device). The legal basis for processing is our legitimate interest.

Cookies

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. Cookies may be small files or other types of information storage. There are different types of cookies:



SEEDpath

Privacy Policy

- i) Essential Cookies. Essential cookies are cookies to provide a correct and user-friendly website; and
- ii) Non-essential Cookies. Non-essential Cookies are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyze your behavior on a website (“analytical” cookies) or cookies used to display advertisements to you (“advertising” cookies).

Google Analytics

We also use Google Analytics provided by [Google LLC](#). Google Analytics also uses cookies to enable our website to analyse how users use our website across multiple devices. The information generated by the cookies about your use of our website is transmitted to and stored by Google, including transmission to the United States. The following data is processed through the use of Google Analytics: i) 3 bytes of the IP address of the called system of the website visitor (anonymized IP address), ii) the website called up, iii) the website from which the user reached the accessed page of my website (referrer), iv) the subpages accessed from the website, v) the time spent on the website, and vi) the frequency with which the website is accessed. Google states that it will not associate your IP address with any other data held by Google. You can disable tracking by Google Analytics with

Hosting

The hosting services used for the purpose of operating our website is [Vercel Inc](#). In doing so Vercel processes all data and communication data of our website users, and visitors that is provided through the website. We use Vercel, on the basis of our legitimate interests in an efficient and secure provision of the website and services in conjunction with the provision of contractual services and the conclusion of the contract for our services.

Google Fonts

We use Google Fonts by [Google LLC](#) on our website to display external fonts. To enable the display of certain fonts on our website, a connection to the Google server in the USA is established when our website is accessed. The connection to Google established when you call up our website enables Google to determine which website sent your request and to which IP address the display of the font is to be transmitted. This represents a legitimate interest.

Downloading the APP

The APP can be downloaded from the "Google Playstore" a service offered by [Google LLC](#), or the Apple App service "App Store" a service of [Apple Inc](#). Downloading it may require prior registration with the respective App store and/or installation of the respective App store software.

Installing the APP

As far as we are aware, Google collects and processes the following data: License check, network access, network connection, WLAN connections, and location information. However, it cannot be ruled out that Google also transmits the information to a server in a third country. We cannot influence which Personal Information Google processes with your registration and the provision of downloads in the respective App store and App store software. The responsible party in this respect is solely Google as the operator of the Google Play Store.

As far as we are aware, Apple collects and processes the following data: device identifiers, IP addresses, location information, it cannot be excluded that Apple also transmits the information to a server in a third country. We cannot influence which Personal Information Apple processes with your registration and the provision of downloads in the respective app store and app store software. The responsible party in this respect is solely Apple as the operator of the Apple App Store.

Device information



Privacy Policy

Google and Apple may collect information from and about the device(s) you use to access the APP, including hardware and software information such as IP address, device ID and type, device-specific and APP settings and properties, APP crashes, advertising IDs (AAID), information about your wireless and mobile network connection such as your service provider and signal strength; information about device sensors such as accelerometer, gyroscope, and compass.

Data we collect directly

Contacting us

In addition to your name, e-mail address, IP address or telephone number, if provided, we usually collect the context of your message which may also include certain Personal Information. The Personal Information collected when contacting us is to handle your request and the legal basis is both your consent and contract.

We are present on social media. If you contact or connect with us via social media Platforms, we and the relevant social media Platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contract.

When using our services

We process the data of our registered users in order to be able to provide our contractual services, to let you manage your tournaments as well as to ensure the security of our services and to be able to develop it further. The legal basis for the data processing is the fulfillment of our contractual obligations and, in individual cases, the fulfillment of our legal obligations as well as your consent.

When using our APP

When you use the APP, we ask you for your name and obtain certain information in relation to your use of our Games. The information obtained along with your name can be accessed in the “Data” section of the APP and is stored locally on your device. You may delete your information using the Clear Data function or through uninstalling our APP. The legal basis for processing is your consent and the fulfillment of our contractual obligations.

Administration, financial accounting, office organization, contact management

We process data in the context of administrative tasks as well as organization of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.

Payment Data

If you make a purchase your payment will be processed via our payment service providers. Payment data will solely be processed through our payment service providers, and we have no access to any Payment Data you may submit. The legal basis for the provision of a payment system is the establishment and implementation of the contract.

Marketing

Insofar as you have given us your separate consent to process your data for marketing and advertising purposes, we are entitled to contact you for these purposes via the communication channels you have given your consent to.

You may give us your consent in a number of ways including by selecting a box on a form where we seek your permission to send you marketing information, or sometimes your consent is implied from



Privacy Policy

your interactions or contractual relationship with us. Where your consent is implied, it is on the basis that you would have a reasonable expectation of receiving a marketing communication based on your interactions or contractual relationship with us.

Direct Marketing generally takes the form of e-mail but may also include other less traditional or emerging channels. These forms of contact will be managed by us, or by our contracted service providers. Every directly addressed marketing sent or made by us or on our behalf will include a means by which you may unsubscribe or opt out.

General Principles

Who receives my data?

Within ABA World LLC, those that need your data to fulfill our contractual and legal obligations will receive access to it.

Processors used by us may also receive data for these purposes. These are companies in the categories of IT services, telecommunications, and sales and marketing. Where we use processors to provide our services, we take appropriate legal precautions and corresponding technical and organizational measures to ensure the protection of Personal Information in accordance with the relevant legal provisions.

Data is only passed on to third parties within the framework of legal requirements. We only pass on users' data to third parties if this is necessary, for example, for contractual purposes or on the basis of legitimate interests in the economic and effective operation of our business or you have consented to the transfer of data.

How long will my data be stored?

As far as necessary, we process and store your Personal Information for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract.

In addition, we are subject to various storage and documentation obligations, which result from the minimum statutory retention periods. The retention and documentation periods specified there are 2 to 6 years.

How do we secure your data?

Our Platform uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of content or contact requests that you send to us. We have also implemented numerous security measures ("technical and organizational measures") for example encryption or need to know access, to ensure the most complete protection of Personal Information processed through our Platform.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Information may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Information may have been compromised as expeditiously as possible after which the breach was discovered.

Is data transferred internationally?

We may transfer your Personal Information as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Information when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organizational measures to protect the Personal Information we transfer.



SEEDpath

Privacy Policy

Special Category Data

Unless specifically required when using our services and explicit consent is obtained for that service, we do not process special category data.

Automated decision-making

Automated decision-making is the process of making a decision by automated means without any human involvement. Automated decision-making including profiling does not take place.

COPPA (Children Online Privacy Protection Act)

When it comes to the collection of Personal Information from children under the age of 13 years old, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, United States' consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online. We do not specifically market to children under the age of 13 years old.

CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations. To be in accordance with CANSPAM, we agree to the following: If at any time you would like to unsubscribe from receiving future emails, you can email us, and we will promptly remove you from ALL correspondence.

Controls For Do-Not-Track Features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ('DNT') feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, our website does not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this policy.

DO NOT SALE

We do not sale your Personal Information.

Your Rights and Privileges

Privacy rights

You can exercise the following rights:

- *Right to information*
- *Right to rectification*
- *Right to deletion*
- *Right to data portability*
- *Right of objection*
- *Right to withdraw consent*

If you have any questions about the nature of the Personal Information we hold about you, or if you wish to exercise any of your rights, please contact us.

Updating your information



SEEDpath

Privacy Policy

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so by contacting us.

Withdrawing your consent

You can revoke consents you have given at any time by contacting us. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

Access Request

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Information or to make a correction requested by you, we will tell you why.

Changes

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

Contact us

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us using the details provided above.

Effective Date

Friday, May 19, 2023