

College Sports Commission Privacy Policy

Effective: June 25, 2025

The College Sports Commission (referred to in this policy as “**we**”, “**our**”, “**us**”, or the “**CSC**”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This Privacy Policy explains the manner in which we collect, utilize and maintain Personal Information (as defined below) about individuals located in the United States (referred to in this policy as “**you**” or “**user**”), including through (i) operation of our website available at <https://www.collegesportscommission.org/> (the “**Site**”) as well as (ii) the provision of our services, including through the NIL Go and CAPS platforms (the “**Platforms**”) and any other services we offer that link to this Privacy Policy (such services together with the provision of the Platforms, collectively, the “**Services**”). For more information on our privacy practices specific to the NIL Go platform, please read the NIL Go Privacy Policy available [here](#). Please note that this Privacy Policy does not apply to information collected through any website operated by any third party (including any educational institution which student athletes may be affiliated with), even if such website is linked to or accessible from the Site or Services. By using this Site or our Services and accepting our Terms & Conditions (“**Terms**”), you consent to the policies and practices described in this Privacy Policy.

The purpose of this Privacy Policy is to disclose to you what Personal Information (as defined below) we may collect, how we may collect it, with whom we may share it, and certain other matters related to such information.

- **Information we collect and the sources from which we collect it**

We collect, process and maintain several types of information, some of which may constitute Personal Information, from and about users of the Site or our Services. “**Personal Information**” means any information that identifies, relates to, describes, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with a particular person, but does not include any information that is publicly available or that is aggregated or de-identified.

The type of Personal Information we collect depends on how you choose to interact with our Site or Services. For instance, we will need different information from our student-athlete users who utilize the NIL Go Platform to submit Name, Image and Likeness (“**NIL**”) deals as opposed to users who simply visit our Site for informational or educational purposes. As a general matter, we may collect the following categories of Personal Information about you in connection with your use of our Site or Services:

From Site visitors:

- Personal Information collected automatically (e.g., via cookies, tracking pixels) regarding how the Site is accessed and used, such as device and browser type, geolocation data, operating system, IP address or other device ID, click patterns, access times, the reading history and other analytics related to how you use and view the content we have provided via the Site, and other general activity information, including as part of our fraud-prevention programs.

From student-athlete users:

- Personal Information you provide directly, including any Personal Information entered on your behalf by your designated representatives, such as profile information, (including name and institutional email address, social media account information and user handle), any third-party NIL deal and other information you submit including your compensation;
- Personal Information provided by your institution, including as related to your revenue share agreements with your institution that detail your compensation;
- Personal Information collected automatically (e.g., via cookies, tracking pixels) regarding how the Services are accessed and used, such as device and browser type, geolocation data, operating system, IP address or other device ID, click patterns, access times, the reading history and other analytics related to how you use and view the content we have provided via the Services, and other general activity information, including as part of our fraud-prevention programs;
- Personal Information created when you communicate through the NIL Go Platform's online chatbot feature, including the content of such communications and the time/date of the communications;
- Personal Information collected from third parties, for example, we will collect your sport, academic year, and eligibility standing from your educational institution, the National Collegiate Athletic Association ("**NCAA**"), and the Cap Management platform, and additional Personal Information, such as social media metrics, broadcast data, sports statistics, and public company information, through partnerships and publicly available directories, such as Dow Jones Factiva and social media platforms.

From student-athlete representatives:

- Personal Information you enter into the Services, such as profile information, (including name and institutional email address);
- Personal Information collected automatically (e.g., via cookies, tracking pixels) regarding how the Services are accessed and used, such as device and browser type, geolocation data, operating system, IP address or other device ID, click patterns, access times, the reading history and other analytics related to how you use and view the content we have provided via the Services, and other general activity information including as part of our fraud-prevention programs; and
- Personal Information created when you communicate through the NIL Go platform's online chat feature, including the content of such communications and the time/date of the communications.

From institutional users:

- Any Personal Information you or the institution you are associated with enter(s) into the Services, such as your name, login information and email address, job title and the institution and teams you are associated with;
- Personal Information collected automatically (e.g., via cookies, tracking pixels) regarding how our Services are accessed and used such as device and browser type, geolocation data, operating system, IP address or other device ID, click patterns, access times, the reading history and other analytics related to how you use and view the content we have provided via the Services, and other general activity information including as part of our fraud-prevention programs;

- Personal Information created when you communicate through our Platforms' online chat feature, including the content of such communications and the time/date of the communications; or
- Any other Personal Information you voluntarily provide through the Services.

- **What we use the information for**

All Personal Information collected will be used in accordance with the relevant terms of service and this Privacy Policy.

With regard to Site visitors, Personal Information will be utilized to provide the Site and Services for purposes including but not limited to:

- Providing you with information you request from us or to fulfill any other purposes for which you provide such information;
- Notifying you of changes to the Site, our policies or our Services;
- To improve our Site and Services;
- For any other purpose for which we have your express consent; or
- For any other purpose we may describe to you when you provide such information.

With regard to student-athlete users and, where applicable, their representatives, Personal Information will be utilized to provide the Site and our Services for purposes including but not limited to:

- Verifying your identity and eligibility to use our Services;
- Contacting you for administrative purposes such as account recovery or to notify you of changes to the Site, our policies or our Services;
- Evaluating the range of compensation for third-party NIL deals;
- Verifying payor information entered as part of a third-party NIL deal;
- Disclosing Personal Information to your institution team, designated representatives, and any other authorized operators or administrators of the Services;
- Generating and sharing aggregated user reports or Personal Information to your institution team, invited representatives, Conferences, other authorized operators, administrators, arbitrators, or enforcement parties, and additional third parties as needed, including as may be required in discovery in any future arbitration proceeding;
- Gathering detailed reports of Personal Information to assist in potential enforcement processes;
- Developing and improving our Site and Services, through conducting research and evaluating analytics; or
- For any other purpose we may describe to you when you provide such information or for which we have your express consent.

With regard to institutional users, Personal Information will be utilized to provide the Site and our Services for purposes including but not limited to:

- Verifying your identity and eligibility to use the Platforms;
- Operating the Platforms and providing our Services;

- Contacting you for administrative purposes such as account recovery or to notify you of changes to the Site, our policies or our Services;
- Responding to your inquiries, performing quality control or otherwise providing customer service and support (including through the chat feature on our Platforms) which may include investigating and responding to complaints;
- Disclosing Personal Information to the institution or team you are associated with, and any other authorized operators or administrators of the Services;
- Generating and sharing aggregated user reports or Personal Information to your institution team, invited representatives, Conferences, other authorized operators, administrators, arbitrators, or enforcement parties, and additional third parties as needed, including as may be required in discovery in any future arbitration proceeding;
- Developing and improving our Site and Services through conducting research and evaluating analytics; or
- For any other purpose we may describe to you when you provide such information or for which we have your express consent.

Additionally, we may use non-Personal Information (including aggregated data) about any user's access to or use of the Site and our Services without restriction, including to understand and analyze the usage metrics and trends and preferences of our users, to monitor, analyze the effectiveness of or otherwise improve the Site and our Services and to improve fraud detection and information security.

- **With whom we share your Personal Information**

In order to deliver our Services and this Site, we may partner with additional third parties and share your Personal Information, as applicable, with them. Specifically, we may disclose your Personal Information to the following categories of third parties for the enumerated processing activities:

- Third parties in connection with the operation of our business, for example to administrators of our Platforms;
- Third-party service providers, including fraud screening providers, analytics providers, IT service providers or data centers and other third-party service providers, for purposes including website development, hosting, maintenance, analytics, security, business continuity, accounting, legal, advisory and other services for us;
- To third parties as permitted or required to do so by applicable law or regulation or in the good-faith belief that such action is necessary to take precautions against liability (e.g., to comply with various reporting obligations; to protect ourselves and our other users from fraudulent, abusive, or unlawful uses or activity; to protect the security or integrity of the Site or Services; to investigate and defend ourselves against any third-party claims or allegations; to assist government enforcement agencies; to comply with state and federal laws; or in response to a court order, judicial or other government subpoena or warrant);
- To an investor, buyer or other successor in the event of an investment, divestiture, merger, consolidation or asset sale, whether as a going concern or in the unlikely event of a bankruptcy or similar proceeding; and
- To any other third party in any way we may describe to you when you provide such information, to fulfill any other purposes for which you provide such information or for any other purpose with your consent or at your direction.

Additionally, we may disclose aggregated, non-Personal Information about our users, and information that cannot independently be used to identify any individual, without restriction.

- **How we protect your information**

Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted via our Site or our Services as any digital transmission of information involves some risk. We implement appropriate technical and organizational measures that are designed to protect your Personal Information from unauthorized access, disclosure, alteration, or destruction, including by securely storing your data in a relational database on AWS, with protection behind a Virtual Private Cloud and Security Group; however, you are also responsible for keeping your Personal Information secure. We work to reduce the risk of unauthorized access to the Site, the Platforms and your Personal Information through a magic link system for authentication, which is sent to the email inbox you indicate. You and/or your email provider are responsible for maintaining the security of your email inbox.

We also cannot guarantee that your information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. We are not responsible for circumvention of any privacy settings or security measures contained on the Site or the Platforms. Even after removal, copies of information that you have posted may remain viewable in cached and archived pages or if other users have copied or stored such information.

- **How long we will retain your information**

We retain information as long as it is reasonably necessary to provide the Site or our Services, and for other purposes including to comply with the law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, defend against legal claims, exercise our legal rights or enforce our Terms or other agreements.

- **Our commitment to children's privacy**

Protecting the privacy of young children and minors is especially important. For that reason, we do not allow children under 13 years of age to use the Site or access our Services, we do not knowingly collect or maintain information from persons under 13 years of age, and no part of the Site or our Services are directed to persons under 13 years of age. If you are under 13 years of age, then please do not use or access the Site or use our Services at any time or in any manner.

If you discover that a child under 13 years of age has provided us with information, please alert us at info@collegesportscommission.org.

- **Visitors from outside the United States**

This Site and our Services are controlled and operated by CSC or its vendors in the United States. If you choose to access the Site or our Services from outside the United States, you acknowledge that you will be transferring your information, including Personal Information, outside of those regions to the United States for storage and processing, as necessary to provide the Site and our Services. Where required,

we comply with applicable legal frameworks relating to the collection, storage, use, and transfer of Personal Information.

- **Your rights**

You may decline to share certain information with us, in which case we may not be able to provide to you some of the features and functionality of the Site or certain of our Services.

You also have the right to request a copy of your Personal Information stored by the Site or our Services or request its deletion. Under certain circumstances, we may not be able to honor your deletion request, including when it is necessary to comply with legal requirements and obligations. To request a copy of or the deletion of your Personal Information stored by us, please email us at info@collegesportscommission.org.

Tracking Technologies. As noted above, when you access and use the Site or Services, we may automatically receive and record certain information from your computer, web browser or mobile device that may constitute Personal Information (as further described above). For example, when you use the Site or our Services, we may send one or more cookies (which are small text files containing a string of alphanumeric characters) to your computer or mobile device to recognize your web browser, help analyze our web page flow, customize our content, measure promotional effectiveness, and/or promote trust and safety. We may also use Google Analytics or a similar service that uses cookies to help us analyze how users use the Site, and such use may be subject to the Google Analytics Terms of Use and Google Privacy Policy. Please click [here](#) for more information about how Google uses information from sites or apps that use their services.

You have the right to decide whether to accept or reject cookies on our Site, which you can exercise by setting your preferences in the Cookie Consent Manager found in the notification banner on our Site titled “Cookie Preferences”. The Cookie Consent Manager allows you to select which categories of cookies you accept or reject; however, note that “essential” cookies (or cookies that are required for technical reasons to operate the Site) cannot be rejected.

In addition, note that if your browser permits, you may also configure your browser to refuse or delete cookies, or to alert you when cookies are being sent. Please consult the corresponding instructions of the manufacturer for more detailed information on the actual procedure.

If you choose to turn off cookies, some parts of the Site or Services may not function properly. Even if you block or delete cookies, not all of the tracking that we have described in this Privacy Policy will stop, as there are certain tracking cookies that are necessary for the functionality of the Site and Services (e.g., via “essential” cookies).

Notice to California Residents.

- *Shine the Light.* Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year, including the names and addresses of those third parties, and

examples of the types of services or products marketed by those third parties. We do not share your personal information with any third parties for their direct marketing purposes.

- *Do Not Track*. We do not permit any third parties (such as advertising networks, analytics providers and widget providers) to collect your information, including your Personal Information, about your online activities over time and across different websites when you access or use our Site or Services. While various browsers offer a “Do Not Track” option, given that we do not allow such tracking and in any event that there is no standard for how “Do Not Track” should work on commercial websites, the Site and our Services do not respond to “Do Not Track” consumer browser settings.

Notice to Nevada Residents. If you are a resident of Nevada, you have the right to opt-out of the sale of certain personal information to third parties. Please note that we do not currently sell your personal information as sales are defined in Nevada Revised Statutes Chapter 603A and therefore do not offer a right to opt-out.

- **Changes and updates to this Privacy Policy**

We reserve the right to update this Privacy Policy at any time. We will notify you of any changes by posting the new Privacy Policy on our Site and any applicable Services, and indicating at the top when it was last updated. Please revisit this page periodically to stay aware of any changes to this Privacy Policy. If you disagree with our Privacy Policy modifications, you may choose not to use or access our Site or otherwise use our Services.

- **Our contact information**

Please contact us with any questions or comments about this Privacy Policy by e-mail at info@collegesportscommission.org.