

DAWN GAMES PRIVACY POLICY

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1. INTRODUCTION

Welcome to Dawn Games, a product of **Cognix Group Technologies Limited** ("we," "us," "our," or "Dawn Games"). We are committed to protecting your privacy and ensuring the security of your personal information.

This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you use our sports and esports management platform, including our website (dawn.games.cognixtech.org), mobile applications, and related services (collectively, the "Services").

By using our Services, you agree to the collection and use of information in accordance with this Privacy Policy. If you do not agree with our policies and practices, please do not use our Services.

2. INFORMATION WE COLLECT

We collect several types of information from and about users of our Services.

2.1 Information You Provide to Us

Account Registration Information:

- Full name
- Email address
- Phone number
- Organization/institution name and details

Sports Club Management Data:

- Athlete profiles (name, age, position, physical measurements, medical information)
- Performance statistics and analytics
- Training session data
- Match/competition results
- Injury records and medical notes

- Parent/guardian contact information (for minors)
- Coach and staff information
- Financial information (membership fees, payment history)
- Video footage and photographs of athletes in training/competition

Esports Platform Data:

- Gaming usernames and profiles
- In-game statistics and performance metrics
- Tournament registration information
- Team affiliations and roster details
- Streaming platform connections (Twitch, YouTube, etc.)
- Prize winnings and payment information
- Communication with other users (chat logs, messages)

Game Development Data:

- Developer credentials and portfolio
- Game project information and assets
- Payment and billing information
- Analytics and usage data from games you develop

Payment Information:

- Credit/debit card details
- Bank account information
- Mobile money account details
- Billing address
- Transaction history

Communications:

- Customer support inquiries and correspondence
- Survey responses and feedback
- Marketing preferences
- User-generated content (reviews, testimonials, forum posts)

2.2 Information Collected Automatically

Technical Information:

- IP address
- Browser type and version
- Device type and operating system
- Unique device identifiers
- Time zone settings
- Internet service provider
- Referring/exit pages

- Date and time stamps of activity

Usage Information:

- Features and pages accessed
- Time spent on pages
- Links clicked
- Search queries within our Services
- Actions taken (uploads, downloads, edits)

Location Information:

- Approximate location based on IP address
- Precise location (if you grant permission via mobile app)

Cookies and Tracking Technologies:

- We use cookies, web beacons, and similar technologies to collect information about your browsing behavior
- See Section 8 for detailed information about cookies

2.3 Information from Third Parties

Social Media Platforms:

- If you connect your social media accounts, we may receive profile information, friends lists, and other data you've made public

Payment Processors:

- Transaction confirmation and payment status from Paystack, Flutterwave, Stripe, and other payment providers

Analytics Providers:

- Aggregated usage data from Google Analytics, Mixpanel, or similar services

Game Platforms:

- In-game statistics and player data from game publishers' APIs (e.g., EA Sports, Riot Games)

Video Analysis:

- When you upload video footage for AI analysis, we process visual data including player movements and positioning
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3. HOW WE USE YOUR INFORMATION

We use the information we collect for the following purposes:

3.1 To Provide and Maintain Our Services

- Create and manage your account
- Process transactions and send transaction notifications
- Provide customer support and respond to inquiries
- Facilitate sports club management functions (scheduling, athlete tracking, performance analysis)
- Host and manage esports tournaments
- Enable game development and publishing features
- Deliver AI-powered performance analytics and cognitive training
- Generate reports and insights for your organization

3.2 To Improve and Develop Our Services

- Analyze usage patterns to improve user experience
- Develop new features and functionality
- Conduct research and testing
- Train and improve our AI and machine learning models
- Monitor and analyze trends and user behavior

3.3 To Communicate with You

- Send service-related announcements and updates
- Respond to your comments, questions, and requests
- Provide technical support
- Send administrative information (policy changes, terms updates)
- Request feedback through surveys
- Send marketing and promotional communications (with your consent)

3.4 For Security and Legal Compliance

- Detect, prevent, and address fraud, security issues, and technical problems
- Enforce our Terms of Service and other policies
- Comply with legal obligations and respond to legal requests
- Protect our rights, property, and safety, and that of our users
- Verify identity and prevent unauthorized access

3.5 For Marketing and Business Development

- Send you information about products, services, and promotions (where you've opted in)
- Conduct market research and analysis
- Personalize your experience and deliver targeted advertising
- Measure the effectiveness of our marketing campaigns

3.6 With Your Consent

- For any other purpose disclosed to you when you provide information
 - As otherwise described in this Privacy Policy or with your explicit consent
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4. LEGAL BASIS FOR PROCESSING (GDPR & NDPR COMPLIANCE)

Under data protection laws including Nigeria's NDPR (Nigeria Data Protection Regulation) and GDPR (if applicable), we must have a legal basis for processing your personal data. We rely on the following:

- **Contract Performance:** Processing necessary to fulfill our contract with you (providing Services)
- **Consent:** Where you've given explicit permission (e.g., marketing emails, location tracking)
- **Legitimate Interests:** Where necessary for our legitimate business interests (fraud prevention, service improvement)
- **Legal Obligation:** Where required by law (tax reporting, responding to court orders)
- **Vital Interests:** Where necessary to protect someone's life or physical safety

You have the right to withdraw consent at any time for processing based on consent, without affecting the lawfulness of processing before withdrawal.

5. HOW WE SHARE YOUR INFORMATION

We do not sell your personal information. We may share your information in the following circumstances:

5.1 Service Providers and Business Partners

We share information with third-party vendors who perform services on our behalf:

- **Cloud Hosting:** Amazon Web Services (AWS), Google Cloud Platform
- **Payment Processing:** Paystack, Flutterwave, Stripe
- **Email Services:** SendGrid, Mailchimp
- **Analytics:** Google Analytics, Mixpanel
- **Customer Support:** Zendesk, Intercom
- **Video Storage:** AWS S3, Cloudflare Stream
- **SMS/Communication:** Twilio, Africa's Talking

These providers are bound by contractual obligations to keep your data secure and confidential.

5.2 Within Your Organization

If you're using Dawn Games as part of an organization (club, academy, esports team):

- Administrators and authorized staff can access relevant data
- Coaches can view athlete performance data
- Parents/guardians can access their children's information
- Team managers can view roster and performance data

Access is role-based and limited to what's necessary for their function.

5.3 With Other Users

- Tournament brackets and leaderboards are publicly visible
- Athlete statistics may be shared with other clubs in the same league
- User profiles may be visible to other members of the platform
- Forum posts and comments are publicly accessible

You control what information is public through your privacy settings.

5.4 Business Transfers

If Dawn Games is involved in a merger, acquisition, sale of assets, or bankruptcy:

- Your information may be transferred to the acquiring entity
- You will be notified via email and/or prominent notice on our website
- The new entity will be bound by this Privacy Policy

5.5 Legal Requirements

We may disclose your information if required by law or in good faith belief that such action is necessary to:

- Comply with legal obligations or court orders
- Respond to government requests
- Enforce our Terms of Service
- Protect the rights, property, or safety of Dawn Games, our users, or others
- Investigate fraud or security issues

5.6 With Your Consent

We may share your information for any other purpose with your explicit consent.

5.7 Aggregated and De-Identified Data

We may share aggregated, anonymized data that cannot identify you individually:

- Industry research and reports
 - Performance benchmarks (e.g., "average sprint speed for 16-year-old footballers")
 - Marketing materials and case studies
 - Academic research partnerships
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6. DATA RETENTION

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

Retention Periods:

- **Account Data:** Retained while your account is active, plus 2 years after account closure (for legal and business purposes)
- **Performance Analytics:** Retained for 5 years to enable longitudinal analysis and trend identification
- **Video Footage:** Retained for 3 years or until you request deletion
- **Financial Records:** Retained for 7 years to comply with tax and accounting regulations
- **Communications:** Customer support tickets retained for 3 years; marketing preferences retained indefinitely or until withdrawal
- **Cookies and Usage Data:** Typically retained for 13 months

Deletion of Data:

- You can request deletion of your data at any time (see Section 11 - Your Rights)
 - We will anonymize or delete data within 30 days of your request, except where retention is legally required
 - Backups may retain data for up to 90 days before automatic deletion
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7. DATA SECURITY

We implement appropriate technical and organizational measures to protect your personal information:

Technical Measures:

- **Encryption:** All data in transit is encrypted using TLS 1.2 or higher; sensitive data at rest is encrypted using AES-256
- **Access Controls:** Role-based access controls limit who can view and modify data
- **Authentication:** Multi-factor authentication available for all accounts
- **Secure Infrastructure:** Hosted on SOC 2 certified cloud providers

- **Regular Security Audits:** Penetration testing and vulnerability assessments conducted quarterly
- **Monitoring:** 24/7 security monitoring for suspicious activity

Organizational Measures:

- **Staff Training:** All employees receive data protection and security training
- **Background Checks:** Staff with access to sensitive data undergo background verification
- **Confidentiality Agreements:** All employees and contractors sign confidentiality agreements
- **Incident Response Plan:** Documented procedures for responding to data breaches
- **Regular Reviews:** Security policies reviewed and updated quarterly

Third-Party Security:

- All service providers undergo security assessments before engagement
- Contracts include data protection and security requirements
- Regular audits of third-party compliance

Despite our best efforts, no system is 100% secure. If you become aware of any security vulnerability, please report it immediately to security@dawngames.ng.

8. COOKIES AND TRACKING TECHNOLOGIES

What Are Cookies?

Cookies are small text files placed on your device that enable certain features and functionality. We use cookies and similar technologies (web beacons, pixels, local storage) to enhance your experience.

Types of Cookies We Use:

Essential Cookies (Required):

- Authentication and session management
- Security features
- Load balancing and performance
- **You cannot disable these cookies while using our Services.**

Functional Cookies (Optional):

- Remember your preferences (language, timezone)
- Save your settings and customizations
- Enable social media features

Analytics Cookies (Optional):

- Understand how you use our Services
- Track page views and user flows
- Measure feature usage and engagement
- Identify errors and technical issues

Marketing Cookies (Optional):

- Deliver personalized advertisements
- Measure advertising campaign effectiveness
- Retarget visitors who didn't complete signup

Third-Party Cookies:

We use the following third-party cookies:

- **Google Analytics:** Usage analytics and reporting
- **Facebook Pixel:** Advertising and audience targeting
- **Twitter Conversion Tracking:** Measure ad campaign success
- **LinkedIn Insight Tag:** B2B marketing and analytics

Managing Cookies:

You can control cookies through:

- **Browser Settings:** Most browsers allow you to refuse or delete cookies
- **Our Cookie Preferences:** Adjust settings in your account dashboard
- **Opt-Out Tools:** Use industry opt-out tools like <http://www.aboutads.info/choices/>

Note: Disabling certain cookies may limit functionality of our Services.

Do Not Track Signals:

Some browsers include a "Do Not Track" (DNT) feature. Our Services do not currently respond to DNT signals, as there is no industry consensus on how to interpret them.

9. INTERNATIONAL DATA TRANSFERS

Dawn Games operates primarily in Nigeria, but we use service providers globally (e.g., cloud hosting in the United States and Europe).

If you're located outside Nigeria:

- Your data may be transferred to and processed in Nigeria or other countries
- These countries may have different data protection laws than your jurisdiction

- We ensure adequate protection through:
 - **Standard Contractual Clauses** approved by the EU Commission (for GDPR compliance)
 - **Data Processing Agreements** with all international service providers
 - **Security measures** outlined in Section 7

By using our Services, you consent to the transfer of your information to countries outside your residence, including Nigeria.

10. CHILDREN'S PRIVACY

Our Services are used by sports academies and schools, which means we process information about minors (under 18 years old).

Parental Consent:

- **For users under 13:** We require verifiable parental consent before collecting personal information
- **For users 13-17:** We require parental notification and allow parents to review and request deletion of their child's data
- Organizations using our Services for minors must:
 - Obtain parental consent before creating athlete profiles
 - Provide parents access to their child's data
 - Notify parents of our privacy practices

Data We Collect About Minors:

- Name, age, date of birth
- Performance statistics and training data
- Video footage of training and matches (with parental consent)
- Medical information (injuries, allergies) as necessary for safety
- Contact information (only accessible to authorized staff and parents)

Limitations on Minor Data:

- Minors cannot create accounts without parental involvement
- Marketing communications are not sent to minors
- Public profiles are disabled by default for users under 18
- Enhanced security protections for minor data

Parents' Rights:

- Review all information collected about their child
- Request correction or deletion of their child's data
- Revoke consent for further data collection

- Prevent sharing of their child's information with third parties (except as necessary for Services)

To exercise parental rights, contact us at: parents@dawngames.ng

11. YOUR RIGHTS AND CHOICES

You have the following rights regarding your personal information:

11.1 Access and Portability

- **Right to Access:** Request a copy of all personal data we hold about you
- **Right to Portability:** Receive your data in a structured, commonly used, machine-readable format (CSV, JSON)
- **How to Exercise:** Email data-request@dawngames.ng or use the "Export My Data" feature in your account settings

11.2 Correction and Updating

- **Right to Rectification:** Correct inaccurate or incomplete personal information
- **How to Exercise:** Update information directly in your account settings or contact support@dawngames.ng

11.3 Deletion (Right to be Forgotten)

- **Right to Erasure:** Request deletion of your personal data
- **Exceptions:** We may retain data where legally required (financial records, legal disputes) or for legitimate business purposes (fraud prevention)
- **How to Exercise:** Email deletion@dawngames.ng or use the "Delete My Account" feature (requires identity verification)

11.4 Restriction and Objection

- **Right to Restrict Processing:** Limit how we use your data in certain circumstances
- **Right to Object:** Object to processing based on legitimate interests or for marketing purposes
- **How to Exercise:** Email privacy@dawngames.ng with specific objections

11.5 Withdraw Consent

- **Right to Withdraw Consent:** Revoke consent for processing based on consent at any time
- **How to Exercise:** Adjust settings in your account dashboard or email consent@dawngames.ng

- **Note:** Withdrawal doesn't affect lawfulness of processing before withdrawal; may impact ability to use certain Services

11.6 Opt-Out of Marketing

- **Right to Opt-Out:** Stop receiving marketing communications
- **How to Exercise:**
 - Click "Unsubscribe" link in any marketing email
 - Adjust email preferences in account settings
 - Email marketing-optout@dawngames.ng

11.7 Lodge a Complaint

If you believe we've violated your privacy rights:

- **Contact us first:** privacy@dawngames.ng (we'll investigate and respond within 30 days)
- **Regulatory Authority:** You can lodge a complaint with:
 - **Nigeria:** Nigeria Data Protection Bureau (NDPB) - <https://ndpb.gov.ng>
 - **EU residents:** Your local data protection authority

Response Time:

We will respond to all rights requests within **30 days** of receipt. If we need more time (up to 60 days for complex requests), we'll notify you and explain the delay.

12. CALIFORNIA PRIVACY RIGHTS (CCPA)

If you are a California resident, you have additional rights under the California Consumer Privacy Act (CCPA):

Right to Know:

- Categories of personal information collected
- Categories of sources
- Business or commercial purpose for collection
- Categories of third parties with whom we share information
- Specific pieces of personal information collected about you

Right to Delete:

- Request deletion of personal information we collected from you (subject to exceptions)

Right to Opt-Out of Sale:

- **We do not sell personal information.** If this changes, we will provide a "Do Not Sell My Personal Information" link.

Right to Non-Discrimination:

- We will not discriminate against you for exercising your CCPA rights

How to Exercise CCPA Rights:

- Email: info@cognixtech.org
- Phone: +234 708 311 4936

Verification: We will verify your identity before fulfilling requests using information already in our records. For sensitive data requests, we may require additional verification.

Authorized Agents: You may designate an authorized agent to make requests on your behalf. The agent must provide proof of authorization.

13. NEVADA PRIVACY RIGHTS

Nevada residents have the right to opt-out of the sale of certain personal information. **We do not sell personal information as defined under Nevada law.** If this changes, we will provide the required opt-out mechanism.

14. EUROPEAN ECONOMIC AREA (EEA) USERS

If you are located in the EEA, you have rights under the General Data Protection Regulation (GDPR):

Legal Basis for Processing:

- See Section 4 for detailed legal bases

Data Controller:

- Cognix Technologies Limited (Dawn Games) is the data controller for your information

Data Protection Officer:

- Contact: privacy@cognixtech.org

Additional GDPR Rights:

- All rights listed in Section 11 apply
- Right to lodge complaint with your local supervisory authority
- Right to judicial remedy if you believe your rights have been violated

Data Transfers:

- See Section 9 for information on international data transfers and safeguards
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15. UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect:

- Changes in our data practices
- New features or services
- Legal or regulatory requirements
- Industry best practices

How We Notify You:

- **Material Changes:** We will notify you via email and/or prominent notice on our website at least 30 days before changes take effect
- **Minor Changes:** Updated "Last Updated" date at the top of this policy; continued use of Services constitutes acceptance

Your Options:

- If you disagree with updated terms, you may close your account before the changes take effect
 - We will provide a copy of the previous Privacy Policy upon request
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16. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

Email:

- General inquiries: info@cognixtech.org

Postal Address: Cognix Group Technologies Limited (Dawn Games)

23 Abakiliki Road, GRA

Enugu, Enugu State

Nigeria

Phone: +234 708 311 4936

Business Hours: Monday-Friday, 9:00 AM - 5:00 PM WAT

Response Time: We aim to respond to all inquiries within 5 business days.

17. ADDITIONAL INFORMATION

17.1 Third-Party Links

Our Services may contain links to third-party websites, applications, or services (e.g., social media platforms, payment processors, game publishers). We are not responsible for the privacy practices of these third parties. Please review their privacy policies before providing any information.

17.2 Social Media Features

Our Services include social media features (e.g., Facebook "Like" button, Twitter "Tweet" button). These features may collect your IP address, which page you're visiting, and may set a cookie. Your interactions with these features are governed by the privacy policy of the company providing them.

17.3 Testimonials and User Content

With your consent, we may display personal testimonials on our website. If you wish to update or delete your testimonial, contact us at marketing@dawngames.ng.

17.4 Referral Programs

If you participate in our referral program and provide information about others (names, emails), you represent that you have their consent to share their information with us.

17.5 Job Applicants

If you apply for employment with Dawn Games, we collect information submitted in your application (resume, cover letter, references). This information is used solely for recruitment purposes and is retained according to our employment record retention policy.

17.6 Biometric Data

Our AI performance analytics may process video footage that includes biometric information (facial recognition for player identification, gait analysis). This processing:

- Requires explicit consent
- Is used only for performance analysis purposes
- Can be opted out of at any time
- Is subject to heightened security measures

17.7 Automated Decision-Making

We use automated decision-making and profiling in limited circumstances:

- **AI Performance Predictions:** ML models predict athlete development trajectories

- **Cognitive Training Recommendations:** Algorithms suggest personalized training programs
- **Fraud Detection:** Automated systems flag suspicious transactions

You have the right to:

- Obtain human review of automated decisions
- Express your point of view
- Contest automated decisions

To request human review: Email info@cognixtech.org

By using Dawn Games, you acknowledge that you have read, understood, and agree to be bound by this Privacy Policy.

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