



MOBILE APP PRIVACY POLICY OF HALFCOURT GLOBAL PTY LTD

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HALFCOURT — MOBILE APP PRIVACY POLICY

Halfcourt's commitment to privacy

Halfcourt Global Pty Ltd ACN 698 923 689, trading as Halfcourt (**Halfcourt, we, us or our**), is committed to managing personal information in accordance with the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**) and other applicable privacy laws.

This Privacy Policy applies specifically to your use of the Halfcourt mobile application (the **App**). It explains what personal information we collect through the App, how we collect, hold, use and disclose it, and how you can access or correct your information or make a complaint.

This Privacy Policy does not cover personal information collected through or in connection with the Halfcourt website. Personal information collected in those contexts is handled under Halfcourt's website privacy policy, available at www.playhalfcourt.com/privacy.

In this Privacy Policy, "we" and "us" refers to Halfcourt Global Pty Ltd, and "you" refers to any individual about whom we collect personal information through the App.

About Halfcourt

Halfcourt is a sports technology and services company that operates a basketball-focused platform connecting players, venues and communities through games, programs, competitions and events.

Halfcourt offers a range of services including facilitating court bookings, organising and administering basketball runs, competitions and events, managing community participation, and partnering with venues to activate and optimise court usage.

How do you acknowledge this Privacy Policy?

When you sign up or sign in to the App, you will see a statement below the sign-in options to the effect that "by continuing you agree to our Terms of Use and acknowledge our Privacy Policy." By creating an account, or by continuing to use the App, you acknowledge that you have read this Privacy Policy and understand how we will collect, use, hold and disclose your personal information as described in it.

Where we need your consent, including for direct marketing described below, we will ask for that consent separately and specifically. We do not treat your acknowledgement of this Privacy Policy as that consent.

We will also give you a short collection notice in the App at or before the time we collect your personal information, which explains what we are collecting and why, and links to this Privacy Policy.

What personal information does Halfcourt collect through the App?

Signing up

When you create a Halfcourt account, we collect your email address and password, or, if you sign in using a third-party sign-in service (Sign in with Google or Sign in with Apple), the details provided to us by that service. If you use Sign in with Apple and choose to hide your email address, we receive a private relay address rather than your personal email address. Your password is held by our authentication provider and is not held by Halfcourt. Your email address is verified using a 6-digit code sent to you.

Completing your profile (onboarding)

To use the App, you must complete your profile. This requires you to provide:

- your first name, last name and username;
- your date of birth;
- your gender (Male, Female, Other, or Prefer not to say);
- your height;
- how often you play basketball; and
- your basketball experience level (from Beginner to Expert).

A profile photo is optional. You may also choose to provide your home court, at which point the App will request permission to access your device's location (see Permissions below).

We use the information collected during onboarding, together with your date of birth, height, play frequency and experience level, to calculate your starting player rating.

Because completing your profile is required, we are unable to provide you with the App if you do not provide this information (other than your profile photo and home court, which are optional).

Gender

You must select an option for gender, but you can choose “Prefer not to say.” If you select “Male,” “Female” or “Other,” we use this information to support females-only games and matchmaking and to display it on your profile as described in “What can other users see about you?” below. If you select “Prefer not to say,” we record that choice rather than your gender.

Age

You must be at least 13 to use the App. We ask for your date of birth when you sign up and rely on the date you give us. If it shows you are under 13, we will not create your profile and will delete the sign-in details you provided. Once your profile is complete you cannot change your date of birth in the App; if it is wrong, contact us. We may ask for evidence before correcting it, and if we decline we will tell you why and how to complain.

Users under 18 have additional protections:

- their profile is hidden from adults who are not their friends;
- an adult cannot send them a friend request, or invite or challenge them unless already friends;
- teams made up entirely of under-18 players are matched only with other under-18 teams, at venues we have approved for under-18 play (an under-18 player on a team with an adult friend plays in the open pool);
- they can enter junior events only;
- they have a separate leaderboard; and
- their age and home court are never shown to other users.

Permissions

The App may request the following permissions from your device. You can turn any of these permissions off at any time in your device settings. Each is optional, and the App remains usable without them, subject to reduced functionality:

- Location — used, while you are actively using the App, to sort nearby courts by distance, populate the map, and show “players nearby.” Your precise location is never shown to other users. It is not stored on your profile, and we do not track your location in the background. When a game captain sets up a game, the search area (map centre and radius) is set by default to the captain’s current location, and we store that search area until the captain’s account is deleted. Your precise location is also recorded in our server logs, which we keep for 90 days.
- Photos and camera — used for your profile picture and for photos you choose to attach to venue reviews. Please do not upload photos of other people without their permission. You can report a photo to us and we will review it.
- Push notifications — we ask for this permission shortly after you sign in. If granted, we store your device’s push notification token so we can send you notifications.

Information collected through your use of the App

As you use the App, we collect:

- game setup information (such as team size, whether a game is females-only, age band, time and venue or area);
- game records (venue, time, rosters and scores);
- your rating history and statistics, which are visible to other users;
- player ratings you receive from game captains after a game, covering punctuality, sportsmanship, skill and scoring integrity, plus any optional notes — these are only ever shown to other users as averages, and individual ratings and notes are not disclosed;
- your reviews, notes and photos of venues;
- your friends and any users you have blocked;
- your bookings and tournament entries;

- payment information, being the identifiers assigned to you by our payment processor, the amount paid, and your card brand, the last four digits of your card number and your wallet type (your full card details are provided directly to our payment processor and are never held by Halfcourt); and
- your Premium subscription status, managed through the relevant app store via our subscription management provider.

Automatically collected and technical information

We (and our service providers) automatically collect:

- your IP address, which we use for rate limiting and load-balancer logging, and retain for 90 days;
- your app version and related technical headers; and
- crash reports, which are sent to our error-monitoring provider and identified only by a pseudonymous ID. Crash reports do not include your name or email address, but may include other information displayed in the App at the time of the crash.

We do not use any advertising or analytics SDKs, we do not request access to your device's advertising identifier and you will not see an app-tracking permission prompt, we do not access your contacts, and the App does not have a chat feature.

Does Halfcourt use automated decision-making?

We use computer programs to make some decisions about you using your personal information.

The personal information we use is: your date of birth and age, height, gender (unless you selected "Prefer not to say"), play frequency and experience level; your game results and scores; the ratings game captains give you after games; the area and time you choose for a game; whether you are under 18; and any blocks between you and other users.

These processes involve algorithms that analyse your personal information to support these features and the following decisions are made using these processes: whether an account can be created, based on the date of birth you enter, including refusing an account if you are under 13; whether you are placed in the separate under-18 group; your starting player rating; which players, teams and games you are matched with, using filters for under-18 players, females-only games, age range and blocked users; and whether you can enter an event. If you have a concern about a decision, contact us using the details below and a member of our team will review it.

Some of these decisions, such as a decision that an account cannot be created, that you cannot join a particular game or that you cannot enter an event, could reasonably be expected to significantly affect your rights or interests.

What personal information does Halfcourt collect other than through the App?

Venue partners, clients and other business contacts

Where you represent a venue, club, council, sponsor or other organisation that deals with Halfcourt, we may collect your name, position and organisation details, your business contact details, information relevant to venue operations, bookings and service delivery, and our communications and correspondence with you.

We use this information to manage our relationship with your organisation, to negotiate and perform our agreements, to administer bookings, programs, competitions and events, and to tell you about our services.

Other individuals, events and sensitive information

We may collect personal information about individuals who do not hold a Halfcourt account. This includes members of the public who participate in or attend events we are involved with, individual contractors and service providers, and other individuals who deal with us on a commercial basis. Generally this is limited to your name, contact details and information about our dealings and transactions with you.

If you participate in an event we manage or deliver, we may take photographs or audio-visual recordings that identify you, and we may use them to promote Halfcourt and its events where you would reasonably expect us to do so.

We may collect personal information about children, for example where children participate in events we are involved with. Where a child does not have sufficient maturity and understanding to make decisions about their own personal information, we will require a parent or guardian to make those decisions on the child's behalf.

In limited circumstances we may collect sensitive information. For example, if you are injured at an event promoted or delivered by Halfcourt, we may collect health information about you in an emergency or otherwise with your consent. We collect sensitive information only where you have consented, or where we are otherwise permitted or required to do so by law, and we use and disclose it only for the purpose for which it was collected unless you agree otherwise or the law permits it.

What can other users see about you?

Other signed-in adult users can see your first name and last initial, username, profile photo, gender (unless you selected “Prefer not to say”), age, height, rating, statistics and game history. Your friends can also see your full name and home court.

We never show your email address, exact date of birth, play frequency, experience level, or individual post-game ratings (including notes) to other users.

You can control who may challenge or invite you to a game through your privacy settings (Anyone, Friends, or No one), and you can block other users at any time. As set out above, additional protections apply to under-18 users.

How and why do we collect and use your personal information?

We collect personal information that is reasonably necessary for us to provide the App and its features, including to:

- create and manage your account;
- operate matchmaking, ratings, bookings, game and tournament features;
- process payments and manage your subscription;
- provide map and location features, if you give the App permission to access your location;
- facilitate your participation in games, competitions and events organised through the App;
- communicate with you about your account, bookings and activity;
- enforce our terms of use, investigate reports about conduct, and manage exclusions and suspensions, including notifying venues;
- send you marketing communications about Halfcourt’s services, promotions and events, if you have agreed to receive them and where you have not opted out (see Direct marketing below);
- maintain the security, performance and reliability of the App, including rate limiting, fraud detection and crash diagnosis;
- manage our relationships with venue partners, clients, sponsors, contractors and service providers;
- assess, recruit and engage employees, contractors and volunteers;
- comply with our legal and regulatory obligations; and
- respond to your enquiries and complaints.

We collect personal information directly from you, through the App. We also collect some information automatically when you use the App, such as device and crash information and, with your permission, location data. We also collect information about you from other users, such as the ratings and notes game captains give you after a game, the conduct reports and game results other players submit, and the scores and team lists they submit, and from Google or Apple (if you use them to sign in), our payment processor and the app stores. We also receive limited information from third parties who support our operations, as set out below.

How does Halfcourt disclose your personal information, and to whom?

We disclose personal information to the following categories of third-party service providers, to the extent necessary for them to provide their services to us:

- authentication and push notification providers (including holding your password);
- third-party sign-in services, if you choose to sign in using an existing account with one of those services;
- cloud hosting and infrastructure providers — our database, photo storage and transactional email;
- payment processing providers;

- subscription management providers, together with the app store through which your subscription is purchased;
- error-monitoring providers — crash and error reporting (pseudonymised, as described above); and
- mapping and location service providers — for map and location features (On Android devices the App uses Google Maps. On Apple devices the App uses the mapping service built into the device, which Apple provides).

We require our service providers to protect your personal information to at least the standard set out in this Privacy Policy and to use it only to provide their services to us. Some companies handle your information under their own privacy policies rather than on our behalf. If you sign in with Google or Apple, or buy a subscription through the App Store or Google Play, those companies also handle your information under their own privacy policies.

We may also disclose your information to venue operators and other users as reasonably necessary to facilitate bookings, games and events. When you book, or take part in a game or event at, a venue, we give that venue's operator your username and the date and time of the booking. If you have been excluded from a venue, or suspended from the App for conduct at a venue, we may tell the operator of that venue, and of any venue where you hold a booking during the exclusion or suspension, that you are excluded or suspended and for how long, so it can refuse entry. We do not give venue operators the reasons for an exclusion or suspension unless you agree or the law requires or authorises it. Our contracts with venue operators require them to keep this information confidential, use it only for these purposes, and protect it to at least the standard set out in this Privacy Policy.

A limited number of Halfcourt staff can access user information to operate and support the App. Staff with administrator access can see your name and email address. We log each time staff export or change user information.

We may also disclose personal information to our professional advisers (such as lawyers, accountants and insurers), and to government agencies, regulators or law enforcement where required or authorised by law.

Does Halfcourt disclose your personal information overseas?

Yes. Several of our service providers are based, or store or access personal information, outside Australia. In particular, our authentication, payment processing, subscription management, error-monitoring, third-party sign-in and mapping providers are based, or headquartered, and are therefore likely to store or access your personal information in the United States of America. Our primary database and photo storage, provided by our cloud hosting provider, is located in Sydney, Australia.

Unless we have your consent or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the recipient does not breach the APPs in relation to that information.

Direct marketing

With your consent, we may use your contact details and push notification token to send you marketing communications about Halfcourt's services, promotions and events. You can give or withdraw this consent in your notification settings in the App. If you do not want to receive marketing communications, you can opt out at any time using the unsubscribe or notification settings in the App, by using the unsubscribe link in any marketing email, or by contacting us using the details below. If you opt out of marketing, we may still send you functional communications relating to your account, bookings and activity.

How do we hold and protect your information?

We store App data in secure databases operated by our service providers described above, including our cloud hosting provider (Sydney, Australia) and our authentication provider. We also hold some personal information in our email and cloud office systems, such as correspondence with you, records of enquiries, complaints and conduct investigations, and records of bookings, games and events we organise. We take reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure, including through access controls, staff permissions and audit logging as described above. When we no longer need personal information for any purpose for which we may use or disclose it under this Privacy Policy, and the law does not require us to keep it, we take reasonable steps to destroy or de-identify it.

How long do we keep your information, and what happens if you delete your account?

You can delete your Halfcourt account within the App. You can also request deletion at www.playhalfcourt.com/delete-account. To protect your account, deleting it requires you to re-authenticate.

Once you delete your account:

- your account is disabled and hidden for a 30-day grace period, during which it cannot be recovered.
- after the grace period, your personal information (including your profile, photos, and your records held by our authentication, payment processing and subscription management providers) is erased or anonymised;
- your game records, rating history and tournament entries, and conduct reports made by or about you, are kept, but are linked to an anonymous identifier rather than to your name or account; and
- your payment records are retained as required by law for financial record-keeping purposes.

We may keep information for longer than set out above where the law requires or authorises us to, or where we reasonably need it to deal with a complaint, dispute or legal claim.

Can you deal with us anonymously?

You can contact us with a general enquiry or feedback without identifying yourself, or by using a pseudonym. If you do, we may not be able to respond to you or resolve your enquiry fully. Because the App requires an account to function, it is generally not practicable for you to use the App anonymously or under a pseudonym. We need an email address to create and secure your account. We also need your first and last name to complete your profile. We use your name to identify you to other players, to support conduct reporting and enforcement of our terms of use, and to administer bookings and payments. Other users see your username alongside your first name and last initial (your friends see your full name), as described in "What can other users see about you?" above.

How can you access or correct your personal information?

You can access and update most of your profile information directly within the App. For other requests to access or correct your personal information, please contact our Privacy Officer using the details below.

You will not be charged for making a request to access your personal information, but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

If you consider any personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you may request correction. We will take reasonable steps to correct your information, or, if we decline your request, we will provide you with reasons for our decision.

What should you do if you have a complaint about the handling of your personal information?

You may contact us at any time if you have questions or concerns about this Privacy Policy or how your personal information has been handled, using the details below.

We will generally respond to your complaint within a week. If your complaint requires more detailed investigation, we will acknowledge receipt within a week and aim to complete our investigation within 30 days of receipt. If the matter is more complex, we will let you know.

If you are not satisfied with our response, or you consider that Halfcourt may have breached the APPs or the Privacy Act, you may make a complaint to the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted on 1300 363 992 or through its website.

How are changes made to this Privacy Policy?

We may amend this Privacy Policy from time to time. If we make a material change, we will notify you through the App or by email before the change takes effect. We recommend you check this Privacy Policy periodically to keep up to date with any changes.

How can you contact us?

Halfcourt Privacy Officer

Address: 55 Collins Street, Melbourne VIC 3000

Email: support@playhalfcourt.com

This Privacy Policy was last updated in September 2026.