

****Privacy Policy****

KHADZ Solutions, Inc. d/b/a HySkyl

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Version: 2.0

This Privacy Policy describes how KHADZ Solutions, Inc., a Delaware corporation doing business as HySkyl ("HySkyl," "we," "us," or "our"), collects, uses, shares, and protects information about you when you use our platform at hyskyl.com and related services (collectively, the "Platform"). By using the Platform you agree to the practices described in this Privacy Policy.

**1. Information We Collect**

**1.1 Information You Provide**

- Account information: first name, last name, email address, phone number, date of birth, and username when you register.
- Identity verification result: HySkyl uses Stripe Identity to verify your identity. You submit your government-issued ID and a selfie directly to Stripe. These documents and biometric images are collected, processed, and retained by Stripe pursuant to Stripe's privacy policy. HySkyl does not collect, store, or receive copies of your government-issued ID or biometric images. HySkyl receives only the verification result (pass or fail) and basic verified attributes (such as verified name, date of birth, and address on file) required for compliance and account management.
- Financial information: payment card details and bank account information are collected and processed through Stripe Elements. HySkyl does not store raw card numbers or full bank account numbers. All payment data is tokenized by Stripe.
- Communications: messages, support requests, and other communications you send to us.
- NDA and investor information: name, email, phone, company, title, and electronic signature if you execute a Non-Disclosure Agreement through our investor portal.

**1.2 Information Collected Automatically**

- Game performance data: statistics, match results, kill/death ratios, win/loss records, and other in-game metrics retrieved through official game developer APIs when you link your gaming accounts to HySkyl.
- Device and usage data: IP address, browser type, operating system, pages visited, timestamps, and interaction data.
- Real-time geolocation data: when you attempt to place a wager, HySkyl collects your real-time IP address and geolocation data through a third-party geolocation provider. This information is used solely to verify that you are physically present in a permitted jurisdiction at the time of the wager, as required by applicable law.
- Transaction data: wager amounts, lobby participation, match results, pre-announced prize allocations, deposits, withdrawals, and platform fees.

**1.3 Information from Third Parties**

- Game accounts: when you link a gaming account we receive your public profile

data and match history from that platform's API.

- Payment and identity partners: Stripe provides transaction confirmation, identity verification results, and payment processor status. Stripe does not transmit your identity documents or biometric images to HySkyl.

2. How We Use Your Information

We use the information we collect to:

- Create and manage your account and confirm your identity through Stripe.
- Process deposits, withdrawals, and wager transactions.
- Verify game match results through official game developer APIs.
- Verify your real-time physical location at the time of a wager to enforce jurisdictional restrictions.
- Send one-time verification codes (OTP) via SMS for account access and security.
- Communicate with you about your account, transactions, and Platform updates.
- Enforce our Terms of Service and detect fraud, cheating, or prohibited conduct.
- Comply with applicable laws, regulations, and legal process, including tax reporting.
- Improve and develop the Platform.
- Send marketing communications where you have opted in (you may opt out at any time).

3. SMS Messaging and Phone Numbers

HySkyl uses SMS messaging to send one-time verification codes for account access, investor portal access, and security verification. By providing your phone number and requesting a verification code, you consent to receive these transactional SMS messages from HySkyl.

Message frequency varies based on your account activity. Message and data rates may apply depending on your mobile carrier plan.

To opt out of SMS messages, reply STOP to any message from HySkyl. Note that opting out of SMS may prevent you from accessing certain features that require phone verification.

For help, reply HELP to any message or contact us at legal@hyskyl.com.

HySkyl does not sell or share your phone number with third parties for their marketing purposes. Your phone number is used solely for account verification, security, and Platform communications.

4. Cookies and Tracking Technologies

HySkyl uses cookies and similar tracking technologies to operate the Platform, maintain your session, remember your preferences, and analyze how the Platform is used. Categories of cookies and tracking technologies we may use include:

- Strictly necessary cookies: required for the Platform to function, including authentication and session management.

- Functional cookies: remember your preferences and settings.
- Analytics cookies: help us understand how users interact with the Platform so we can improve it. These may be first-party or provided by third-party analytics services.

You may control cookies through your browser settings. Disabling strictly necessary cookies may prevent parts of the Platform from functioning correctly. HySkylldoes not respond to Do Not Track (DNT) browser signals at this time.

5. How We Share Your Information

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

5.1 Service Providers

We share information with trusted service providers:

- Stripe, Inc.: payment processing, identity verification, and payment-side anti-money-laundering monitoring.
- Twilio Inc.: SMS messaging for account verification.
- Resend: transactional email delivery.
- Railway: cloud infrastructure and hosting.
- Geolocation provider: real-time IP geolocation and VPN/proxy detection for wager-time compliance verification.
- Bungie, Inc.: game data verification for Destiny 2.
- Valve Corporation and Faceit: game data verification for CS2 and Dota 2.
- KRAFTON, Inc.: game data verification for PUBG: Battlegrounds.
- Additional game developer partners as new titles are enabled on the Platform, including Riot Games (pending approval) for Valorant, League of Legends, and Teamfight Tactics.

All service providers are contractually required to use your information only as directed by HySkylldoes.

5.2 Legal Requirements

We may disclose your information if required by law, court order, or governmental authority, or to protect our rights or the safety of others.

5.3 Business Transfers

If HySkylldoes is acquired or merged, your information may be transferred as part of that transaction. We will notify you before your information becomes subject to a different policy.

5.4 With Your Consent

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

6. Data Retention

- Match and game session data: retained for 30 days following match completion for dispute resolution, audit, and reconciliation, then anonymized or aggregated for analytics.

- Financial transaction records: retained for 7 years per applicable financial recordkeeping requirements.
- Identity verification results and verified attributes received from Stripe: retained as required by applicable law and financial recordkeeping requirements. Underlying identity documents and biometric images are retained by Stripe, not by HySkyl.
- Account data: retained until you request deletion, subject to legal retention requirements.
- NDA and investor records: retained indefinitely as executed legal agreements.

7. Data Security

We implement industry-standard security measures including encryption in transit (TLS), encrypted storage of sensitive credentials, and access controls. No security system is impenetrable and we cannot guarantee absolute security.

In the event of a data breach that affects your personal information, we will notify you consistent with applicable state and federal breach notification laws.

8. Your Rights and Choices

Depending on your jurisdiction, you may have the right to:

- Access a copy of the personal information we hold about you.
- Request correction of inaccurate information.
- Request deletion of your personal information, subject to legal retention requirements.
- Request your data in a machine-readable format.
- Opt out of marketing communications at any time.
- Opt out of SMS by replying STOP to any message.

To exercise these rights, contact us at legal@hyskyl.com. We will respond within 30 days.

8.1 California Residents

If you are a California resident, the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), provides you with additional rights regarding your personal information.

Categories of personal information collected. In the preceding 12 months, HySkyl has collected the categories of personal information described in Section 1 of this Privacy Policy, including identifiers, commercial information (transaction data), internet or network activity, geolocation data, and professional or account-related information.

Sources. HySkyl collects this information directly from you, automatically from your use of the Platform, and from third-party service providers (including Stripe and game developer APIs) as described in Section 1.3.

Purposes. HySkyl uses this information for the purposes described in Section 2.

Sharing. HySkyl shares personal information only with the service providers and in the circumstances described in Section 5. HySkyl does not sell your personal

information and does not share your personal information for cross-context behavioral advertising.

Your rights. Subject to legal exceptions and verification, you have the right to (a) know what personal information we have collected, used, disclosed, and (if applicable) sold or shared; (b) request deletion of your personal information; (c) request correction of inaccurate personal information; (d) opt out of the sale or sharing of your personal information (HySkylI does not sell or share); and (e) not be discriminated against for exercising your rights.

To exercise these rights, contact us at legal@hyskylI.com. You may designate an authorized agent to make a request on your behalf. We will verify your identity before responding.

9. Children's Privacy

HySkylI is intended solely for users who are 18 years of age or older. We do not knowingly collect personal information from anyone under 18. If you believe we have collected information from a minor, contact us at legal@hyskylI.com.

10. Third-Party Links and Services

The Platform may link to third-party websites or integrate third-party services. This Privacy Policy does not apply to those third parties. We encourage you to review the privacy policies of any third-party services you use in connection with HySkylI.

11. Changes to This Policy

We may update this Privacy Policy from time to time. When we make material changes, we will notify you by updating the "Last Updated" date and Version number and, where appropriate, by email or in-Platform notification. Your continued use of the Platform after changes constitutes acceptance of the updated policy.

12. Contact Us

KHADZ Solutions, Inc. d/b/a HySkylI

legal@hyskylI.com

hyskylI.com

For privacy-related inquiries, email legal@hyskylI.com. We will respond within 30 days.

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