

METATICKET — PRIVACY POLICY

Last Updated: [Date]

1. INTRODUCTION

1.1 MetaTicket LLC (“MetaTicket,” “we,” “us,” or “our”), a Georgia limited liability company with its principal place of business in Atlanta, Georgia, is committed to protecting the privacy of users of our platform (metaticket.org), mobile application, and related services (collectively, the “Platform”).

1.2 This Privacy Policy describes how we collect, use, disclose, store, and protect your personal information when you interact with our Platform, including our use of blockchain technology and Non-Fungible Token (“NFT”) ticketing.

1.3 By using the Platform, you consent to the practices described in this Privacy Policy. If you do not agree, please do not use the Platform.

2. INFORMATION WE COLLECT

2.1 Information You Provide Directly

Category	Examples
Account Information	Name, email address, phone number, date of birth, username, password
Payment Information	Credit/debit card details, billing address, bank account information (processed by our third-party payment processors)
Identity Verification	Government-issued ID, proof of address (for KYC/AML compliance)
Digital Wallet Information	Public wallet address (we do not collect private keys or seed phrases)
Communications	Customer support inquiries, feedback, survey responses
Event Preferences	Saved events, search history, notification preferences

2.2 Information Collected Automatically

Category	Examples
Device Information	Device type, operating system, browser type, unique device identifiers
Usage Data	Pages viewed, features used, clickstream data, session duration
Location Data	Approximate location derived from IP address; precise location only with your explicit consent
Log Data	IP addresses, access timestamps, referring URLs, error logs
Cookies and Tracking	Cookies, web beacons, pixels, and similar technologies (see Section 8)

2.3 Information from Third Parties

Source	Information
Event Organizers	Event details, attendee lists, seating assignments
Payment Processors	Transaction confirmation, fraud screening results
Identity Verification Services	KYC verification results
Social Media Platforms	Public profile information (if you link social accounts)
Analytics Providers	Aggregated usage analytics

2.4 Blockchain-Specific Data

IMPORTANT — Blockchain Data Transparency Notice:

When you interact with NFT Tickets on the blockchain, certain information becomes part of the public, immutable blockchain record. This includes:

- (a) **Wallet Addresses** — Your public wallet address is recorded on the blockchain in connection with NFT Ticket purchases, transfers, and sales;
- (b) **Transaction History** — The blockchain records all NFT Ticket transactions, including minting, transfers, and sales, with timestamps;

(c) **Smart Contract Interactions** — Your interactions with MetaTicket Smart Contracts are publicly visible on the blockchain;

(d) **Token Metadata** — NFT Ticket metadata (event name, date, seat information) may be stored on-chain or referenced via decentralized storage.

We cannot modify or delete data recorded on the blockchain. Blockchain data is pseudonymous (identified by wallet address, not by name), but it may be possible for third parties to associate wallet addresses with your identity through on-chain analysis or cross-referencing with other data.

Our Hybrid Data Architecture: To protect your privacy, MetaTicket employs a hybrid data architecture:

- **Off-Chain (Private):** Personally identifiable information (name, email, phone, payment details) is stored in encrypted, access-controlled databases managed by MetaTicket;
- **On-Chain (Public):** Only pseudonymous wallet addresses, transaction hashes, and non-identifying token metadata are recorded on the blockchain.

We will **never** record your name, email address, phone number, or other directly identifying information on the blockchain.

3. HOW WE USE YOUR INFORMATION

3.1 We use your personal information for the following purposes:

Purpose	Legal Basis (GDPR)
Providing Platform Services — Processing NFT Ticket purchases, facilitating resales, validating event admission	Performance of contract
Account Management — Creating and managing your account, authenticating your identity	Performance of contract
Payment Processing — Processing payments, managing refunds, preventing fraud	Performance of contract; Legitimate interest
Customer Support — Responding to inquiries, resolving disputes	Performance of contract; Legitimate interest
Platform Improvement — Analyzing usage patterns, improving features, fixing bugs	Legitimate interest
Security and Fraud Prevention — Detecting and preventing unauthorized access, fraud, and abuse	Legitimate interest; Legal obligation
Legal and Regulatory Compliance — Complying with KYC/AML requirements, tax obligations, and lawful requests	Legal obligation
Marketing and Communications — Sending promotional emails, event recommendations (with your consent)	Consent
Analytics and Research — Aggregated, anonymized data analysis for market insights	Legitimate interest

4. HOW WE SHARE YOUR INFORMATION

4.1 We may share your personal information with the following categories of recipients:

Recipient	Purpose	Data Shared
Event Organizers and Venues	Fulfilling event admission, managing attendee lists	Name, email, ticket details
Payment Processors	Processing transactions	Payment details, transaction amounts
Identity Verification Providers	KYC/AML compliance	Government ID, name, address
Cloud Infrastructure Providers	Hosting and data storage	All data (encrypted)
Analytics Providers	Platform analytics	Anonymized/pseudonymized usage data
Legal and Regulatory Authorities	Compliance with legal obligations, responding to lawful requests	As required by law
Professional Advisors	Legal, accounting, and insurance services	As necessary
Business Transferees	In connection with a merger, acquisition, or sale of assets	All data (subject to confidentiality)

4.2 We do **not** sell your personal information to third parties for their marketing purposes.

4.3 We do **not** share your personal information with third parties for cross-context behavioral advertising without your explicit opt-in consent.

5. DATA RETENTION

5.1 We retain your personal information for as long as necessary to fulfill the purposes described in this Privacy Policy, subject to the following:

Data Category	Retention Period
Account information	Duration of account + 3 years
Transaction records	7 years (tax and legal compliance)
Payment card data	Not stored; handled by payment processors
KYC/AML documentation	5 years after account closure
Customer support records	3 years
Usage/analytics data	2 years (anonymized thereafter)
Blockchain data	Permanent (inherent to blockchain technology)
Marketing preferences	Until consent is withdrawn

5.2 When personal information is no longer needed, we will securely delete or anonymize it. Blockchain records are immutable and cannot be deleted; however, we minimize on-chain personal data as described in Section 2.4.

6. YOUR PRIVACY RIGHTS

6.1 Rights Under the California Consumer Privacy Act (CCPA/CPRA)

If you are a California resident, you have the following rights:

- (a) **Right to Know** — Request disclosure of the categories and specific pieces of personal information we have collected about you;
- (b) **Right to Delete** — Request deletion of your personal information, subject to legal exceptions;
- (c) **Right to Correct** — Request correction of inaccurate personal information;
- (d) **Right to Opt-Out of Sale/Sharing** — We do not sell or share your personal information for cross-context behavioral advertising;
- (e) **Right to Non-Discrimination** — We will not discriminate against you for exercising your privacy rights;
- (f) **Right to Limit Use of Sensitive Personal Information** — Request that we limit the use and disclosure of your sensitive personal information.

To exercise your CCPA rights: Email [privacy@metaticket.org] with the subject line “CCPA Request” or use the privacy request form on the Platform. We will verify your identity and respond within **45 days** (extendable by an additional 45 days with notice).

6.2 Rights Under the General Data Protection Regulation (GDPR)

If you are located in the European Economic Area (“EEA”), United Kingdom, or Switzerland, you have the following rights:

- (a) **Right of Access** (Article 15) — Request a copy of your personal data;
- (b) **Right to Rectification** (Article 16) — Request correction of inaccurate data;
- (c) **Right to Erasure** (Article 17) — Request deletion of your personal data (“right to be forgotten”);
- (d) **Right to Restriction** (Article 18) — Request restriction of processing;
- (e) **Right to Data Portability** (Article 20) — Receive your data in a structured, machine-readable format;
- (f) **Right to Object** (Article 21) — Object to processing based on legitimate interest;
- (g) **Right to Withdraw Consent** — Withdraw consent at any time where processing is based on consent;
- (h) **Right to Lodge a Complaint** — File a complaint with your local data protection authority.

Blockchain Limitation: We acknowledge your right to erasure; however, data recorded on a public blockchain is immutable and cannot be deleted by MetaTicket or any party. We mitigate this by storing personally identifiable information off-chain and recording only pseudonymous wallet addresses on-chain. Upon erasure request, we will delete all off-chain personal data, effectively severing the link between your identity and your on-chain wallet activity within our systems.

To exercise your GDPR rights: Email [privacy@metaticket.org] with the subject line “GDPR Request.” We will respond within **30 days**.

6.3 Rights Under Georgia Law

Georgia does not currently have a comprehensive consumer privacy statute comparable to the CCPA or GDPR. However, MetaTicket complies with the Georgia Fair Business Practices Act (O.C.G.A. § 10-1-390 et seq.) and any applicable Georgia laws and regulations governing data protection. Georgia residents may contact us with privacy inquiries at [privacy@metaticket.org].

7. DATA SECURITY

7.1 We implement commercially reasonable administrative, technical, and physical security measures to protect your personal information, including:

- (a) Encryption of personal data in transit (TLS 1.2+) and at rest (AES-256);
- (b) Access controls limiting employee access to personal data on a need-to-know basis;
- (c) Regular security assessments and penetration testing;
- (d) Smart Contract security audits by independent third-party firms;
- (e) Multi-factor authentication for administrative accounts;
- (f) Incident response procedures for data breach detection and notification.

7.2 No method of data transmission or storage is completely secure. While we strive to protect your personal information, we cannot guarantee absolute security.

7.3 Data Breach Notification. In the event of a data breach that is reasonably likely to result in harm, we will notify affected individuals and applicable regulatory authorities in accordance with the Georgia Personal Identity Protection Act (O.C.G.A. § 10-1-912) and other applicable breach notification laws, including the GDPR's 72-hour notification requirement where applicable.

8. COOKIES AND TRACKING TECHNOLOGIES

8.1 We use the following tracking technologies:

Type	Purpose	Duration
Essential Cookies	Authentication, security, basic functionality	Session / 1 year
Functional Cookies	Preferences, language, display settings	1 year
Analytics Cookies	Usage statistics, Platform performance	2 years
Marketing Cookies	Targeted advertising (only with consent)	1 year

8.2 Cookie Consent. On your first visit, you will be presented with a cookie consent banner allowing you to accept or reject non-essential cookies. You may modify your preferences at any time through your account settings.

8.3 Do Not Track. The Platform respects browser "Do Not Track" signals where technically feasible.

9. INTERNATIONAL DATA TRANSFERS

9.1 MetaTicket is based in the United States. If you access the Platform from outside the United States, your personal information may be transferred to and processed in the United States, where data protection laws may differ from those in your jurisdiction.

9.2 For transfers from the EEA, UK, or Switzerland to the United States, we rely on:

- (a) Standard Contractual Clauses (SCCs) approved by the European Commission;
 - (b) The EU-U.S. Data Privacy Framework, where applicable;
 - (c) Your explicit consent, where other mechanisms are unavailable.
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10. CHILDREN'S PRIVACY

10.1 The Platform is not intended for individuals under **eighteen (18) years of age**. We do not knowingly collect personal information from minors.

10.2 If we become aware that we have collected personal information from a minor without parental consent, we will take steps to delete it promptly. If you believe a minor has provided us with personal information, please contact [privacy@metaticket.org].

11. THIRD-PARTY LINKS

11.1 The Platform may contain links to third-party websites, services, or blockchain explorers. We are not responsible for the privacy practices of these third parties. We encourage you to review their privacy policies before providing personal information.

12. CHANGES TO THIS PRIVACY POLICY

12.1 We may update this Privacy Policy from time to time. We will notify you of material changes by posting the updated policy on the Platform and sending an email notification at least **thirty (30) days** before the changes take effect.

12.2 Your continued use of the Platform after the effective date of the updated Privacy Policy constitutes your acceptance of the changes.

13. CONTACT US

For questions, concerns, or requests related to this Privacy Policy or your personal information, contact:

MetaTicket LLC — Privacy Team

[Street Address]

Atlanta, Georgia [ZIP]

Email: [privacy@metaticket.org]

Data Protection Officer (for GDPR inquiries):

Email: [dpo@metaticket.org]

This Privacy Policy does not constitute legal advice. MetaTicket recommends that Users consult with qualified legal counsel regarding their privacy rights.