

California Privacy Notice

Supplement to the Upfan Privacy Policy for California residents and California events

Effective date: August 20, 2026

1. Introduction and scope

This California Privacy Notice supplements the Upfan Privacy Policy and applies to California residents who visit the Upfan website, use the Upfan mobile application, create an account, purchase or receive a Ticket, contact support, or interact with Upfan in connection with any California Event. The applicable Event page identifies the Organizer and links to any separate Organizer or Venue privacy notice. Certain rights described below apply only to the extent required by the California Consumer Privacy Act, as amended ("CCPA"), or other applicable law.

2. Who is responsible for personal information

- **Upfan, s. r. o.** operates the platform, maintains Upfan accounts, provides ticketing technology, collects payments as the Organizer's authorized payment collection agent, provides support, secures and improves the platform, and conducts its own analytics and marketing activities.
- **The Organizer identified on the applicable Event page** is the seller of Tickets and determines Event details, admission rules, purchaser communications and Event-related uses of ticketing and attendance data. Each Organizer is responsible for its own privacy practices and must provide its legal identity, contact details and applicable privacy notice before purchase.
- **Separate roles.** Depending on the processing activity, Upfan may process information for the Organizer as a service provider or contractor and may also process information for its own independent purposes. The Organizer is responsible for its own privacy practices and communications.

3. Categories of personal information

Category	Examples	Purposes
Identifiers and account information	Name, email address, telephone number, username, account ID, postal or billing address, IP address, device identifiers, cookie identifiers, and login credentials.	Account creation, authentication, ticket delivery, support, security, communications and legal compliance.
Customer and commercial information	Ticket purchases, event, session, seat, price, order number, discounts, transfers, refunds, chargebacks, attendance and scan history.	Processing orders, providing admission, preventing fraud, customer service, Event reporting, accounting and legal compliance.

Category	Examples	Purposes
Payment and transaction information	Payment status, transaction identifier, billing information, payment method type and limited card details such as last four digits where available. Full card details are processed by Revolut and are not stored by Upfan.	Payment authorization, reconciliation, refunds, chargebacks and fraud prevention.
Internet and electronic activity	Pages viewed, clicks, navigation, referring URLs, browser and operating system, interactions with features, advertising interactions, analytics events and session recordings.	Platform operation, analytics, troubleshooting, security, product improvement, personalization and advertising.
Approximate location	Approximate location inferred from IP address.	Localization, fraud prevention, analytics and determining relevant notices. Upfan does not intend to collect precise geolocation for California ticket purchases unless separately disclosed.
Demographic information	Age or date of birth and gender, where voluntarily provided or required for an Event.	Eligibility, statistics, personalization and Event requirements. Accounts and purchases are limited to persons aged 18 or older.
Preferences and inferences	Event interests, purchase patterns, marketing preferences and inferred preferences.	Recommendations, segmentation, analytics and marketing, subject to choices and applicable law.
Communications and support records	Emails, requests, complaints, survey responses and support history.	Responding to requests, resolving disputes, service improvement and legal compliance.
Sensitive personal information	Account login credentials and limited payment-related information. Upfan does not use sensitive personal information to infer characteristics about consumers.	Account security, payment processing and fraud prevention.

4. Sources of personal information

- Directly from you when you create an account, purchase or receive a Ticket, transfer a Ticket, contact support, complete a survey or select privacy and marketing preferences.
- Automatically from your browser, device, cookies, pixels, software development kits, analytics tools and session-recording technology.
- From the Organizer, a Ticket purchaser or another person who transfers or assigns a Ticket to you.
- From service providers involved in payments, fraud prevention, analytics, advertising, communications and platform operation.
- From publicly available sources or authorities where necessary for security, fraud prevention or legal compliance.

5. Purposes for collecting and using information

- Create, maintain and secure Upfan accounts.
- Offer, sell, deliver, transfer and validate Tickets and manage Event admission.
- Process payments through the applicable payment provider, currently Revolut unless another provider is disclosed, reconcile funds, issue refunds and manage chargebacks.
- Communicate operational Event information, including changes, cancellations and safety notices.
- Provide customer and technical support and resolve disputes.
- Detect fraud, duplicate Tickets, account misuse, security incidents and prohibited automated activity.
- Measure and improve the website, application, checkout and Event experience.
- Provide personalized content, recommendations and communications where permitted.
- Measure advertising and conduct marketing through Google and Meta, subject to consent, opt-out choices and applicable law.
- Comply with legal, accounting, tax, payment-network and regulatory obligations and protect legal rights.

6. Service providers and third parties

Recipient category / provider	Purpose
Applicable Organizer and Venue	Organizer functions, Event delivery, admission, reporting, support and communications.
Revolut Bank UAB and payment networks	Payment processing, fraud prevention, refunds, chargebacks and settlement.
PostHog	Product analytics, feature analysis, troubleshooting and session recordings. Sensitive fields must be masked and recordings must follow configured retention limits.
Google	Google Analytics 4, Google Tag Manager, Google Ads and related measurement or advertising services.
Meta	Meta Pixel and Meta Conversions API for advertising measurement and audience-related functions.
Technical and professional providers	Hosting, communications, security, legal, accounting, auditing and other operational services, subject to appropriate contractual restrictions.
Authorities and transaction parties	Where required by law, to protect rights and security, or in connection with a merger, financing, reorganization or sale of business assets.

7. Sale and sharing for advertising

Upfan does not sell personal information for money. When Google Ads, Meta Pixel or Meta Conversions API are enabled, Upfan may disclose identifiers, device information and internet activity to Google or Meta for advertising measurement, audience matching or cross-context behavioral advertising. Under California law, some of these disclosures may be considered "sharing," even when no money is exchanged.

- California residents may opt out through the "Your Privacy Choices" link and cookie controls made available on the Upfan website and application.
- Upfan will treat a recognized Global Privacy Control signal as a request to opt out of sale or sharing where required by applicable law.
- Upfan does not knowingly sell or share the personal information of a person under 16 years old.
- Marketing consent for the Organizer and for Upfan must be optional, separate and not preselected.

8. Cookies, analytics and session recordings

Upfan uses essential cookies required for account, checkout, security and Ticket functions. With the user's consent or where otherwise permitted, Upfan also uses analytics and advertising technologies, including Google Analytics 4, Google Tag Manager, Google Ads, Meta Pixel, Meta Conversions API and PostHog analytics and session recordings.

- The cookie banner and "Your Privacy Choices" interface provide information about categories, providers and available controls.
- Rejecting or opting out of non-essential technologies does not prevent the purchase or use of a Ticket.
- Upfan currently does not respond to conventional browser "Do Not Track" signals because there is no universally accepted standard. Upfan will honor legally recognized opt-out preference signals such as Global Privacy Control after technical implementation.
- PostHog session recordings must mask passwords, payment fields, contact details and other sensitive form inputs. Session recording should be disabled on payment-provider pages and any page where reliable masking cannot be guaranteed.

9. Retention

Data type	Retention period or criteria
Account and profile data	While the account remains active and for 3 years after deactivation. Accounts may be deactivated after 12 months without a login.
Ticket, order, payment, refund and chargeback records	For the period necessary for Event delivery, accounting, tax, payment-network, chargeback, dispute and legal obligations; proposed maximum of 10 years after the transaction unless a longer period is required for a dispute or by law.
Support, complaints and legal correspondence	Generally 3 years after the matter is closed, or longer while a dispute or legal obligation remains active.
Marketing preferences and direct-marketing records	Until consent is withdrawn, the user opts out, the purpose ends or the account is deactivated, subject to a suppression record retained to respect the opt-out.

Data type	Retention period or criteria
Analytics, cookie and advertising data	For the period stated in the cookie center and configured in the relevant provider, limited to what is reasonably necessary for analytics, security and advertising.
PostHog session recordings	Up to 90 days, unless a shorter period is sufficient or a specific recording must be preserved to investigate a security or support incident.
Security and system logs	Up to 12 months, unless required for an active security investigation or legal claim.

Upfan may retain deidentified or aggregated information that cannot reasonably be linked to an individual. Deletion is subject to legal exceptions and backup-cycle limitations.

10. California privacy rights

Where the CCPA applies, a California resident may have the right to:

- Know the categories and specific pieces of personal information collected, the sources, purposes and recipient categories.
- Delete personal information, subject to legal and operational exceptions.
- Correct inaccurate personal information.
- Opt out of the sale or sharing of personal information for cross-context behavioral advertising.
- Limit certain uses or disclosures of sensitive personal information, where applicable.
- Receive equal service and not be discriminated against for exercising privacy rights.
- Use an authorized agent to submit a request, subject to verification and proof of authority.

11. How to exercise rights

- Email info@upfan.io with the subject "California Privacy Request."
- Use the privacy request form at <mailto:info@upfan.io>.
- Use the "Your Privacy Choices" link for sale/sharing opt-out requests.
- For Event-specific personal information controlled by an Organizer, you may also contact the Organizer using the privacy or support contact shown on the applicable Event page, checkout or purchase confirmation.

Upfan may verify a request through the email address or logged-in account associated with the personal information and may request additional information when reasonably necessary. Upfan aims to respond to a verifiable request within 45 days where required by the CCPA and may extend the period where legally permitted. You do not need to create a new account to submit a request.

12. Children and minors

Upfan accounts and Ticket purchases are intended for persons aged 18 or older. A parent or legal guardian may purchase and hold Tickets for a minor. Upfan does not knowingly direct the platform to children under

13 or knowingly collect their personal information without appropriate parental authorization. Upfan does not knowingly sell or share personal information of persons under 16.

13. Security and international processing

Upfan uses reasonable administrative, technical and organizational safeguards designed to protect personal information. Personal information may be processed in the European Economic Area, the United States and other countries in which Upfan, the Organizer or service providers operate. Different countries may have different privacy laws. Upfan uses contractual and other safeguards where required by applicable law.

14. Changes to this notice

The effective date appears at the top of this Notice. Material changes will be posted conspicuously and, where appropriate, communicated through the Upfan account or email. Changes will not be applied retroactively in a materially inconsistent manner without appropriate notice or consent.

15. Contact

Entity	Contact
Upfan, s. r. o.	Karpatské námestie 10A, 831 06 Bratislava - Rača, Slovak Republic info@upfan.io
Applicable Organizer	Legal name, permanent business address, privacy notice and support contact shown on the Event page, checkout and purchase confirmation