

ProBetFunded

PRIVACY AND COOKIE POLICY

LEGAL DOCUMENT

Effective date	21 September 2026
Version	2.0
Contracting entity	Data Infrastructure Development Group LLC, a Wyoming limited liability company
Registration number	2026-002069408
Registered address	30 N Gould St #45117, Sheridan, Wyoming 82801, United States of America
Website / Platform	https://probetfunded.tradetechcheckout.com/
Support / Legal contact	support@probetfunded.com

1. Controller and Scope

Data Infrastructure Development Group LLC (“the Company”, “we”, “us”, “our”) is the controller for the personal data processing described in this Policy, unless a third-party provider acts as an independent controller for its own service. Registration number: 2026-002069408. Registered address: 30 N Gould St #45117, Sheridan, Wyoming 82801, United States of America. Website: <https://probetfunded.tradetechcheckout.com/>. Privacy contact: support@probetfunded.com.

This Policy applies when you visit the website, create an Account, purchase or use a Challenge, submit Picks, communicate with support, complete verification, participate in the Funded Stage, request a Reward, use affiliate links or interact with marketing.

Because the Company intends to offer Services to individuals in the EEA and United Kingdom from a U.S. entity, the Company will appoint and publish an EU representative and UK representative before launch where legally required. Representative details will be added to this Policy when appointed.

2. Personal Data We Collect

- Identity data: legal name, date of birth, nationality, government identification, selfie/liveness, signature and verification results.
- Contact data: email, telephone number, residential address, country and communication preferences.
- Account data: username, internal identifiers, authentication records, settings, policy acceptance and security events.
- Transaction data: orders, amount, currency, payment status, billing country, partial payment instrument details, refunds, disputes and payout information.
- Program data: Challenge plan, Picks, timestamps, Virtual Balance, simulated results, rule flags, pass/fail status, Reward calculations and appeals.
- Technical and location data: IP address, device identifiers, browser, operating system, language, time zone, cookies, logs, geolocation signals and fraud indicators.
- Compliance data: KYC results, sanctions/PEP screening, source-of-funds or source-of-wealth information, tax information and investigation notes.
- Communications and support data: emails, tickets, complaints, survey responses and call recordings where appropriate notice is given.
- Sports-integrity data: occupation, employer, sports role, event connection and declarations concerning material non-public information.

3. Sources of Data

We obtain data directly from you, your device, payment providers, identity and fraud vendors, sanctions and public databases, sports-data providers, affiliates, customer-support tools and other persons who report suspected abuse. We may infer risk or integrity indicators from Account, device, location, payment and Pick patterns.

4. Purposes and Legal Bases

Where EU GDPR or UK GDPR applies, we rely on one or more of the following legal bases: performance of a contract, compliance with legal obligations, legitimate interests, consent, and establishment or defence of legal claims.

- Account creation, Challenge delivery, scoring and Reward processing — contract.
- Payment processing, accounting, tax and fraud prevention — contract, legal obligation and legitimate interests.
- Identity, age, location, sanctions and eligibility verification — legal obligation where applicable and legitimate interests in compliance, security and fraud prevention.
- Platform security, incident investigation, sports-integrity controls and defence of claims — legitimate interests and legal claims.
- Customer support and complaint handling — contract and legitimate interests.
- Product analytics and improvement — legitimate interests, and consent where non-essential tracking requires it.
- Direct marketing — consent or another lawful basis where permitted, always with an available opt-out where required.

5. Automated Processing and Human Review

Automated tools may flag duplicate Accounts, suspicious payments, location conflicts, sanctions matches, unusual strategy patterns, objective rule thresholds or security events. Where applicable law restricts solely automated decisions producing legal or similarly significant effects, the Company will provide appropriate human review and contest mechanisms.

6. Sharing and Processors

- Payment processors, banks and payout providers.
- Identity, age, geolocation, sanctions, PEP, fraud and cybersecurity vendors.
- Cloud hosting, software, CRM, customer-support, email and communications providers.
- Sports-data, analytics and integrity providers where necessary for scoring or investigation.
- Professional advisers, auditors, insurers and corporate transaction counterparties under appropriate confidentiality obligations.
- Authorities, courts, regulators and financial institutions where required or permitted by law.
- Affiliates and contractors where roles, purpose limitations and security obligations are documented.

The Company does not sell identification documents or KYC records. If any advertising technology constitutes a “sale” or “sharing” under an applicable privacy law, the Company will provide any required opt-out mechanism.

7. International Transfers

Personal data may be processed in the United States and other countries outside the EEA or UK. Where required, the Company will use an adequacy decision, European Commission Standard Contractual Clauses, the UK International Data Transfer Agreement or UK Addendum, or another recognized transfer mechanism, together with supplementary safeguards where appropriate.

8. Retention

Data category	Indicative retention
Account and contract acceptance	Account life plus 7 years
Orders, tax, refunds and Rewards	7 years or applicable statutory period
KYC, sanctions and compliance records	5 years after relationship end or longer where legally required
Picks, scoring and rule evidence	3 to 7 years depending on dispute exposure
Support and complaints	3 to 7 years
Security and access logs	12 to 24 months, longer for incidents
Marketing consent records	Until withdrawal plus evidence period

9. Security

The Company uses risk-appropriate technical and organizational measures, which may include encryption in transit, access controls, multi-factor authentication, logging, vendor due diligence, backups, segregation of duties, staff confidentiality and incident response. No system can be guaranteed completely secure.

10. Your Privacy Rights

Where EU GDPR or UK GDPR applies, you may have rights to access, correct, erase, restrict or port personal data; object to certain processing; withdraw consent; opt out of direct marketing; request information about transfers; and obtain human review of certain significant automated decisions. You may also complain to the competent supervisory authority.

Privacy requests may be sent to support@probetfunded.com. The Company may verify identity before fulfilling a request and may retain information where required for legal obligations, fraud prevention, security, disputes or the rights of others.

11. Children

The Services are not directed to persons under 18 or any higher local age threshold. The Company does not knowingly permit minors to participate and may delete data and close access after verification, subject to legally required retention.

12. Cookies and Similar Technologies

Cookies, local storage, pixels and similar technologies may support authentication, security, checkout, preferences, analytics, affiliate attribution and advertising. Strictly necessary technologies may operate without optional consent where legally permitted. Non-essential technologies will be disabled until valid consent is obtained where required by EU ePrivacy rules, UK PECR or other applicable law.

Category	Purpose	Consent approach
Strictly necessary	Authentication, checkout, security, consent records	Used where necessary for the requested service
Preferences	Language and remembered settings	Consent where required
Analytics	Traffic, errors, feature use and performance	Prior consent where required
Advertising / attribution	Campaign measurement, retargeting, affiliate attribution	Prior consent where required

13. Cookie Choices

Where consent is required, the first-layer cookie banner should offer clear choices to accept non-essential cookies, reject them, or manage granular settings. Consent must be as easy to withdraw as to give. Refusing optional cookies must not prevent access to core paid Services unless the technology is strictly necessary for that Service.

14. Changes and Contact

The Company may update this Policy to reflect legal, technical or operational changes. Material changes will be communicated appropriately. Questions or privacy complaints may be sent to:

Data Infrastructure Development Group LLC

30 N Gould St #45117, Sheridan, Wyoming 82801, United States of America

Email: support@probetfunded.com

Website: <https://probetfunded.tradetechcheckout.com/>