

**PODIUM PURSUIT**  
**PRIVACY POLICY**

Issued by ProTouch Sports (Pty) Ltd | Version 4.0 | June 2026

<b>Responsible Party</b>	ProTouch Sports (Pty) Ltd
<b>Registration no.</b>	2015/151949/07
<b>Address</b>	9896 Barons View, Plettenberg Bay, Western Cape, South Africa 6600
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<b>Effective date</b>	25 June 2026
<b>Supersedes</b>	All prior Podium Pursuit and ProTouch privacy policy drafts
<b>Primary legal regime</b>	Protection of Personal Information Act 4 of 2013 (POPIA), South Africa
<b>Also applicable</b>	GDPR (European Economic Area (EEA) data subjects); Swiss FADP (Swiss data subjects);

**1. About This Policy**

This policy explains how ProTouch Sports (Pty) Ltd (“ProTouch”, “we”, “us”) collects, uses, discloses, and protects personal information in connection with the Podium Pursuit athlete intelligence and fan engagement platform (“the Platform”) and the BuntuAI data enrichment platform.

ProTouch Sports (Pty) Ltd is incorporated in South Africa and is the responsible party for all personal information processed in connection with the Platform, in terms of the Protection of Personal Information Act 4 of 2013 (POPIA). Where data subjects are located in the European Economic Area or Switzerland, we additionally comply with the GDPR and the Swiss FADP respectively.

This policy applies to: (a) athletes whose profiles and performance data are processed on the Platform; (b) fans and registered app users; (c) institutional subscribers (federations, brands, agents, media organisations, investors, and development finance institutions); and (d) individuals whose data is incidentally captured through our public social-media data collection infrastructure.

**2. Who We Are And Our Operator Relationships**

ProTouch Sports (Pty) Ltd is the responsible party (controller) for all personal information processed on the Podium Pursuit Platform. All other entities in our technology and operational chain process personal information only on our documented instructions and for our specified purposes:

<b>Operator / Sub-operator</b>	<b>Role</b>	<b>Jurisdiction</b>	<b>Data processed</b>
Blocksport AG	Operator, app backend, first-touch fan and athlete account data; write-back of BuntuAI-enriched scores for display in the fan app	Switzerland, AWS Frankfurt	App user accounts, athlete profile data, enriched AVI/SPI scores written back for display
BuntuAI (operated by ProTouch)	Internal processing platform, athlete data enrichment, AVI/SPI scoring, social-media	AWS Frankfurt	Athlete social data, engagement metrics, computed Social Value Index, Athlete Value Index,

Operator / Sub-operator	Role	Jurisdiction	Data processed
	intelligence aggregation		Commercial Activation Index, and Sporting Power Index scores
Apify / scraper infrastructure	Sub-operator, automated collection of publicly accessible social-media data	EU / US (Apify platform)	Publicly posted athlete content and engagement metrics across eight social platforms plus Wikipedia
Anthropic; OpenAI	Sub-operator, AI analysis of athlete narrative and public comment sentiment	US (API processing)	Athlete biographical text and public comment text, processed transiently to produce narrative and sentiment outputs
Third-party payment providers (Fund Your Passion)	Operator, payment routing and settlement for crowdfunding contributions	Per provider terms	Contributor name, email, and payment details for campaign contributions

**Blocksport AG, Operator Agreement in force.** ProTouch and Blocksport AG have concluded a Data Processing Agreement (DPA) governing all processing by Blocksport on our behalf, including a dedicated write-back clause covering the flow of BuntuAI-enriched athlete data (including AVI and SPI scores) back into the Blocksport backend for display in the fan-facing app. Blocksport has no right to use Podium Pursuit’s personal information for its own commercial purposes.

### 3. What Personal Information We Collect And Why

#### 3.1 Athlete Profile Information

We collect and process the following categories of personal information about athletes on the Platform:

- Identity and professional details: full name, nationality, sport, club or federation affiliation, date of birth where verified (used to confirm adult status and to exclude any athlete under 18 from published profiles and scores), career statistics, and biographical information enriched from public sources including Wikipedia
- Social media presence: public profile data, follower counts, post engagement metrics (likes, comments, shares, saves, views), reach estimates, and content performance data collected from public accounts across Instagram, TikTok, X (Twitter), YouTube, Facebook, LinkedIn, Threads, and Snapchat
- Computed scores: the Social Value Index (SVI), a measure of digital influence; the Athlete Value Index (AVI), a composite proprietary score combining a Performance Tier Score with the SVI under a published, capped formula; and the Commercial Activation Index (CAI), an uncapped, performance-blind measure of near-term commercial activation potential. The Sporting Power Index (SPI) is a national and continental ecosystem strength index that aggregates individual athlete signals at country and discipline level; it is an institutional index rather than an individual athlete score
- Biographical and performance data provided by partner federations: competition results, rankings, squad selections, and minutes-played data

**Lawful basis (POPIA):** section 11(1)(f), legitimate interests of ProTouch as responsible party in providing athlete intelligence services to the sports ecosystem, balanced against the reasonable expectations and privacy rights of athletes. For EEA athletes: Article 6(1)(f) GDPR (legitimate interests).

#### 3.2 Fan And App User Information

When an individual registers on the Podium Pursuit fan app (operated on Blocksport AG infrastructure), we collect:

- Registration details: name, email address, and country of residence

- In-app behaviour: content interactions, athlete follows, engagement history, and in-app purchase records
- Super Fan Token participation: where a fan participates in the token economy, wallet address and participation records

**Lawful basis (POPIA):** section 11(1)(b), performance of a contract with the data subject (app terms of service); and section 11(1)(a), consent for marketing communications.

### 3.3 Institutional Subscriber Information

We collect contact and organisational information from institutional subscribers for account administration, delivery of subscription services, and management of the commercial relationship.

**Lawful basis (POPIA):** section 11(1)(b), performance of a contract.

### 3.4 Incidentally Captured Third-Party Information

Our automated social-media data collection infrastructure (59 data collection actors operating across ten sources: eight social platforms, Wikipedia, and four cross-platform AI analysis tools) is directed at athlete accounts. Some of these actors retrieve follower and commenter details (for example username, public display name, profile image, and publicly stated location or bio) where this is necessary to compute an athlete's audience and engagement metrics. In doing so, the infrastructure processes information about third parties who have interacted publicly with athlete accounts.

We do not build standalone commercial profiles of these third parties and we do not market to them. Third-party data is used only in aggregate to characterise an athlete's audience and the sentiment of public engagement with that athlete. Where third-party information is not necessary for athlete audience or engagement analysis, it is filtered and deleted at the point of processing. Comment text used for sentiment analysis is processed in aggregate and is not used to profile individual commenters. Any residual third-party information retained in our systems is subject to this policy and to the retention limits in section 6.

**Lawful basis (POPIA):** section 11(1)(f), legitimate interests in providing accurate athlete engagement metrics. We consider this processing proportionate given the data is limited to publicly posted content, no profile is built of third parties, and retention is minimal.

## 4. How We Generate Our Athlete Indices: The SVI, AVI, CAI, And SPI

Our BuntuAI enrichment platform generates a family of proprietary composite scores from a single intelligence foundation: the Social Value Index (SVI), the Athlete Value Index (AVI), and the Commercial Activation Index (CAI) at the level of the individual athlete, and the Sporting Power Index (SPI) at the level of a nation or region. They are structured, data-driven valuations used to support commercial decisions in the sports intelligence market. They are not general automated decisions producing legal or similarly significant effects about individuals in the sense contemplated by GDPR Article 22, and athletes may inspect, query, and contest their scores as described in section 9.

The Social Value Index (SVI) is a 0 to 100 measure of an athlete's digital influence. It is built from four pillars, reach, engagement, growth, and content consistency, each normalised against a platform-specific benchmark and then combined follower-weighted across up to eight social platforms, so that scores are comparable across athletes regardless of which platforms they use. The SVI is the input on which the other athlete scores build.

The Athlete Value Index (AVI) measures an athlete's earned standing. It combines two components under a published rule: a Performance Tier Score, a fixed anchor drawn from the four-tier athlete performance framework and grounded in verified competitive achievement, and the SVI. The AVI is the average of these two components, capped at the ceiling of the athlete's performance tier, so that social presence alone cannot raise an athlete's value above the level their competitive record supports. This cap is the integrity mechanism that keeps the AVI from being gamed by manufactured audiences.

The Commercial Activation Index (CAI) measures near-term commercial activation potential: who is likely to drive reach, engagement, and leads now. It reweights the same social pillars the SVI already computes, leading with engagement, then reach, growth, and platform fit. It carries no performance term and no cap, and is read alongside the AVI, never inside it. The CAI is an activation-potential measure derived from public reach and engagement signals, not a measure of attributed revenue.

The Sporting Power Index (SPI) operates at ecosystem level rather than individual level. It aggregates individual athlete signals into a national and continental sporting strength measure, and is an institutional index rather than a score about any individual. Full methodology for all four indices is set out in our Index

documentation (Annexure C and its addenda) and is available on request. No index score is generated, published, or commercialised for any individual under the age of 18.

Athletes who are EEA residents and believe that an AVI or SPI score has produced a significant effect on them may request human review of the score calculation, see section 9 (Data subject rights).

### 5. Cross-Border Transfers Of Personal Information

ProTouch Sports (Pty) Ltd is incorporated in South Africa. The following cross-border transfers of personal information occur in connection with the Platform:

<b>ProTouch (SA) → BuntuAI platform</b>	Processing within the ProTouch group. Hosting jurisdiction (AWS Frankfurt). Where hosted in Frankfurt (EEA), appropriate cross-border safeguards under POPIA section 72 apply, including contractual assurances that the recipient applies equivalent protection.
<b>ProTouch (SA) → Blocksport (Switzerland) AG</b>	Transfer from South Africa to Switzerland. Governed by the executed DPA incorporating 2021 EU Standard Contractual Clauses (Module 3: Controller-to-Processor) and supplementary measures including end-to-end encryption in transit and Blocksport AG's ISO/IEC 27001-aligned security programme. Switzerland is generally regarded as providing adequate protection comparable to GDPR standards.
<b>BuntuAI → Blocksport AG (write-back)</b>	Enriched athlete data (AVI/SPI scores) written back from BuntuAI to Blocksport AG for display in the fan app. This flow is documented in clause 7 of the Blocksport DPA and subject to the same SCC safeguards as the primary ProTouch → Blocksport transfer.
<b>Scraper infrastructure (Apify)</b>	Publicly collected social-media data processed on Apify infrastructure (EU/US) before transmission to BuntuAI. Apify operates as a sub-operator engaged directly by ProTouch under a data processing agreement that requires comparable protection to that required by POPIA. Limited athlete data is also processed by AI sub-processors (Anthropic, for narrative analysis and data-quality grading, and OpenAI, for multilingual comment sentiment analysis); these sub-processors are engaged by ProTouch under terms restricting use of the data to the services provided, with transfers subject to the safeguards described in this section.

All cross-border transfers are subject to appropriate safeguards in terms of POPIA section 72, including binding contractual commitments requiring recipient parties to apply a comparable standard of protection to that required by POPIA.

### 6. Retention

We retain personal information for as long as necessary to fulfil the purposes described in this policy, subject to the following:

- Active athlete profiles: retained while the athlete's profile remains active on the Platform. Profiles are deactivated on written request (see section 9).
- Fan and app user information: retained for the duration of an active app account plus 12 months following account closure, to support dispute resolution and regulatory compliance.
- Institutional subscriber information: retained for the term of the subscription plus seven years for financial record-keeping purposes.
- Incidentally captured third-party social data: filtered at collection; residual data not required for athlete score computation deleted within 30 days.
- AVI and SPI scores: retained as part of the longitudinal athlete dataset, which forms the core data asset of the Platform. Athletes may request deletion, see section 9.

## 7. Security

We implement technical and organisational measures appropriate to the risk, including:

- End-to-end encryption in transit (TLS 1.2 minimum) and encryption at rest for all personal information stores
- Access controls limiting processing to personnel with a documented operational need
- AWS infrastructure security controls applied to BuntuAI hosting
- Operator agreements requiring equivalent security standards from Blocksport AG and Apify
- Incident response procedures with notification timelines consistent with POPIA, GDPR, and Swiss FADP requirements

Personal information breaches will be assessed and notified to the Information Regulator and, where required, to affected data subjects in accordance with POPIA section 22.

## 8. Disclosure of personal information

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

- To operators listed in section 2, on documented instructions and for specified purposes only
- To institutional subscribers, who receive athlete AVI/SPI scores and profile data as part of their subscription, this is a core commercial use of the Platform disclosed to athletes at the point of data collection
- To regulators and law enforcement where required by applicable law, including the Information Regulator of South Africa
- In the context of a corporate transaction (merger, acquisition, or asset sale) where personal information forms part of the transferred assets, data subjects will be notified in advance of any such transfer

## 9. Data Subject Rights

Depending on your jurisdiction, you may have some or all of the following rights in respect of your personal information:

<b>Access</b>	Request a copy of the personal information we hold about you (POPIA s.23; GDPR Art. 15)
<b>Correction</b>	Request correction of inaccurate or incomplete information (POPIA s.24; GDPR Art. 16)
<b>Deletion</b>	Request deletion of your personal information, subject to lawful retention obligations (POPIA s.24; GDPR Art. 17)
<b>Objection</b>	Object to processing based on legitimate interests, including use of your information for direct marketing (POPIA s.11(3) and s.69; GDPR Art. 21)
<b>Portability</b>	Request a machine-readable copy of information you have provided to us (GDPR Art. 20, EEA data subjects only)
<b>Automated review decision</b>	Request human review of any significant decision based solely on automated processing, including AVI/SPI scoring (GDPR Art. 22, EEA data subjects; POPIA s.71)
<b>Withdrawal of consent</b>	Where processing is based on consent, withdraw it at any time without affecting the lawfulness of prior processing

To exercise any of these rights, contact: [info@protouch.africa](mailto:info@protouch.africa) We will endeavour to respond within 30 days. We will verify your identity before processing any request.

## 10. Complaints And The Information Regulator

If you have a concern about our processing of your personal information, please contact us first at [info@protouch.africa](mailto:info@protouch.africa) If you are not satisfied with our response, you may lodge a complaint with the relevant supervisory authority:

- South African data subjects: Information Regulator of South Africa, [infoeregulator.org.za](http://infoeregulator.org.za)
- EEA data subjects: the data protection authority in your EU member state of habitual residence
- Swiss data subjects: Federal Data Protection and Information Commissioner (FDPIC), [edoeb.admin.ch](http://edoeb.admin.ch)

## 11. Cookies And Tracking

The Podium Pursuit web platform and fan app use essential cookies and analytics trackers. Full details are provided in our Cookie Policy [[link](#)]. You may manage non-essential cookies through your browser settings or within the app.

## 12. Children

The Podium Pursuit athlete intelligence Platform is directed at adults. We do not create, publish, or commercialise individually identifiable athlete profiles, AVI scores, or SVI scores for any athlete under the age of 18. Date of birth is captured where verified, and any athlete identified as under 18 is excluded from the published Athlete Collective, from BuntuAI enrichment outputs, and from every client and investor deliverable. Where an athlete's age cannot be verified, the profile is not published as an adult profile until age is confirmed. Talent pipeline and youth competition data referenced in the Sporting Power Index is processed only as aggregated, de-identified cohort statistics at national and discipline level, and is not used to build identifiable profiles of individuals under 18. Separately, the Fund Your Passion crowdfunding platform may permit a person under 18 to participate only with verified parental or legal guardian consent and supervision, in accordance with its Terms of Use; any personal information processed in that context is handled under this policy and with the relevant guardian consent. If we become aware that we hold personal information about a child otherwise than as permitted above, we will delete or de-identify it promptly. Contact [info@protouch.africa](mailto:info@protouch.africa) if you believe a child's information has been collected or used other than as described above.

## 13. Changes to this policy

This policy (v4.0) supersedes all prior versions.