

CADEX Legacy, LLC — Privacy Policy

■ DRAFT — ATTORNEY REVIEW REQUIRED BEFORE USE ■

Company: CADEX Legacy, LLC (Texas multi-member LLC — formation pending)

Contact: cadexlegacy@cadexlegacy.com | cadexlegacy.com

Effective Date: [TO BE SET AT LAUNCH]

Last Updated: [TO BE SET AT LAUNCH]

PRIVACY POLICY

CADEX Legacy, LLC ("Company," "we," "us," or "our"), operated by Brett Skinner and Eric Skinner in Austin, Texas, is committed to protecting the privacy of all users of our platform — including parents, legal guardians, coaches, and the minor athletes in their care.

This platform is designed for adults (parents and legal guardians) who manage accounts on behalf of minor athletes. We do not permit minors to create accounts independently.

1. INFORMATION WE COLLECT

1.1 Information You Provide Directly

Guardian/Account Holder:

- Name, email address, phone number, and password (stored in bcrypt-hashed form — never plain text)
- Billing name and address (processed via Stripe; we do not store full card numbers)

Athlete Profiles (submitted by guardian on behalf of the minor):

- First and last name, date of birth
- Sport position(s), training goals
- Favorite snack and drink preferences (for coach preparation)
- Emergency contact name and phone number
- Medical notes, physical conditions, injuries, or limitations the guardian chooses to disclose
- Profile photo (optional, guardian-uploaded)

Session and Booking Data:

- Booking history, session type, session dates and times, coach assignments
- Pre-workout goals submitted before each session
- Post-workout reports and coach feedback (text, video clips, voice memos)
- Session reviews and star ratings submitted by guardians

Consent and Legal Records:

- Timestamps and IP addresses of waiver acceptance, consent confirmations, and Terms of Service agreement

1.2 Information Collected Automatically

- **Usage data:** Pages visited, features used, session duration, interaction patterns

- **Device and network data:** IP address, browser type, operating system
- **Session tokens:** Secure HttpOnly cookies used to maintain authenticated sessions (see Section 7)

1.3 Information Generated Through Platform Use

- **Coach voice memos:** Audio recordings made by coaches after sessions (coach narration only — not recordings of athletes)
 - **AI transcripts:** Text transcripts of coach voice memos generated via OpenAI Whisper API
 - **Zoom session recordings:** Video recordings of group Zoom coaching sessions and personal film review sessions (see Section 2.4 and Zoom Recording Notice below)
 - **Film submissions:** Video files uploaded by guardians for coach film review
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2. HOW WE USE YOUR INFORMATION

2.1 Platform Operations

- Create and maintain your account and athlete profiles
- Process bookings, payments, subscriptions, bundle purchases, and refunds
- Match athletes with available coaches and facilitate session scheduling
- Deliver post-workout reports and coach feedback to guardians
- Send booking confirmations, session reminders, and account notifications via email

2.2 Service Delivery

- Share relevant athlete information (position, goals, preferences, medical notes) with the assigned coach to prepare for and conduct training sessions
- Process coach voice memos through AI transcription (OpenAI Whisper) to produce readable feedback reports for guardians
- Enable eligible subscribers to access the video library, Zoom sessions, and film review features

2.3 Platform Improvement

- Analyze usage patterns to improve Platform features, reliability, and user experience
- Conduct internal quality review of session recordings (Zoom) and post-workout reports

2.4 Zoom Recording Notice

CADEX Legacy conducts weekly group Zoom sessions and personal film review sessions for eligible subscribers. **These sessions are recorded.** Recordings are used for:

- Delivering playback to eligible subscribers through the Platform
- Internal coaching quality review
- Platform content (e.g., film library)

Recordings are stored on CADEX Legacy's infrastructure (Supabase) and may also be processed through Google Drive for delivery. The Platform retains the five (5) most recent group session recordings; older recordings are automatically deleted. By subscribing or attending a Zoom session, you consent to recording on behalf of yourself and your athlete. You may request deletion of a recording in which your athlete appears by contacting cadexlegacy@cadexlegacy.com.

2.5 Legal and Safety Purposes

- Enforce our Terms of Service and other agreements
- Comply with applicable law, court orders, or regulatory obligations
- Protect the safety of athletes, coaches, and the public

3. INFORMATION SHARED WITH THIRD PARTIES — SUBPROCESSORS

We share personal information only as necessary to operate the Platform. We do not sell, rent, or trade personal information to third parties for commercial or marketing purposes.

Subprocessor	Role	Privacy Policy
Stripe, Inc.	Payment processing — handles all session fees, subscriptions, bundle purchases, refunds, and coach payouts via Stripe Connect	stripe.com/privacy
Vercel, Inc.	Hosting and deployment — serves the CADEX Legacy web application	vercel.com/legal/privacy-policy
Resend, Inc.	Transactional email delivery — sends booking confirmations, session reminders, post-workout reports, and account notifications	resend.com/privacy
Squarespace, Inc.	Domain registrar — manages the cadexlegacy.com domain	squarespace.com/privacy
Zoom Video Communications, Inc.	Video conferencing — hosts weekly group Zoom sessions and personal film review sessions; sessions are recorded	zoom.us/privacy
Supabase, Inc.	Database and file storage — stores all platform data including user accounts, bookings, uploaded videos, and voice memos	supabase.com/privacy
OpenAI, L.L.C.	AI transcription — transcribes coach voice memos via the Whisper API for delivery to guardians as readable feedback	openai.com/policies/privacy-policy

■ *Attorney note: Confirm that data processing agreements (DPAs) are in place with each subprocessor as appropriate, particularly for COPPA compliance.*

4. CHILDREN'S PRIVACY — COPPA COMPLIANCE

CADEX Legacy is designed for parents and guardians managing youth athletic training on behalf of minors. We take children's privacy seriously and comply with the Children's Online Privacy Protection Act (COPPA), 15 U.S.C. §§ 6501–6508.

- **Accounts are restricted to adults.** Only parents or legal guardians (age 18+) may create CADEX Legacy accounts.
- **Parental consent is required** before any minor athlete profile is activated for booking. Athletes under age 13 require explicit parental consent via our email-based consent flow before their profile becomes bookable.
- **Information collected about minors** includes: name, date of birth, sport position, training goals, snack and drink preferences, emergency contact, medical notes, and session-related data.
- **We do not collect personal information directly from children under 13.** All data is submitted by the parent or guardian.
- If you believe we have collected information from a minor without proper parental consent, contact us immediately at cadexlegacy@cadexlegacy.com and we will take steps to delete it promptly.

For complete COPPA rights and consent details, see our separate **COPPA Parental Consent Notice & Payment Authorization** document.

5. DATA RETENTION

Data Category	Retention Period
Active account and athlete data	Retained while account is active
Account data after closure	[2 years — ATTORNEY: RECOMMEND]
Payment and transaction records	7 years (tax and accounting requirements)
Booking and session records	[3 years — ATTORNEY: RECOMMEND]
Uploaded videos and voice memos	[1 year from upload — ATTORNEY: RECOMMEND]
Zoom session recordings	5 most recent sessions; older deleted automatically
Legal acceptance records (waivers, consents)	Retained indefinitely as proof of compliance

To request deletion of your data, contact cadexlegacy@cadexlegacy.com. Some records may be retained as required by law even after a deletion request.

6. DATA SECURITY

We implement the following technical and organizational safeguards:

- **Password hashing:** All passwords are hashed using bcrypt — never stored in plain text
- **Encrypted transmission:** All data transmitted over HTTPS/TLS
- **HttpOnly session cookies:** Session tokens are not accessible to client-side JavaScript
- **Role-based access controls:** Guardian, coach, and admin data are strictly separated; coaches can only access their own assigned athletes' session data
- **Administrative access:** Restricted to CADEX Legacy owners (Brett and Eric Skinner)

No method of electronic transmission or storage is 100% secure. We cannot guarantee absolute security.

7. COOKIES AND SESSION TOKENS

We use the following session cookies to operate the Platform:

- ``cadex_session`` — Used for guardian/parent accounts to maintain authentication
- ``cadex_admin_session`` — Used for administrative access only

■ *We do not use third-party tracking, advertising, or behavioral analytics cookies at this time. Attorney note: Review and update if analytics tools (e.g., Google Analytics) are added before launch.*

8. YOUR PRIVACY RIGHTS

Depending on your location and applicable law, you may have the right to:

- **Access:** Request a copy of personal information we hold about you or your athlete
- **Correction:** Request correction of inaccurate or incomplete information
- **Deletion:** Request deletion of your personal information (subject to legal retention requirements)
- **Portability:** Request your data in a portable format
- **Opt out of marketing emails:** Use the unsubscribe link in any marketing email

To exercise any right, contact cadexlegacy@cadexlegacy.com.

9. TEXAS RESIDENTS — TDPSA

Texas residents may have additional rights under the **Texas Data Privacy and Security Act (TDPSA)**, including the right to know, access, correct, delete, and obtain a portable copy of their personal information. To exercise these rights, contact cadexlegacy@cadexlegacy.com.

10. CALIFORNIA RESIDENTS — CCPA

If you are a California resident, you have the following rights under the **California Consumer Privacy Act (CCPA)** as amended by the CPRA:

- The right to know what personal information we collect, use, disclose, and sell (we do not sell personal information)
- The right to delete your personal information
- The right to correct inaccurate personal information

- The right to opt out of the sale or sharing of personal information (we do not sell or share)
- The right to non-discrimination for exercising your privacy rights

To submit a California privacy request, contact cadexlegacy@cadexlegacy.com. We will respond within 45 days.

■ *Attorney note: Confirm whether CADEX Legacy meets the CCPA applicability thresholds. If revenue is below \$25M and you process fewer than 100,000 consumers annually, CCPA may not apply yet — but consider including this section prospectively.*

11. CHANGES TO THIS POLICY

We may update this Privacy Policy from time to time. Material changes will be communicated by email or prominent Platform notice before the effective date. Continued use of the Platform after the effective date constitutes acceptance.

12. CONTACT US

CADEX Legacy, LLC

Brett Skinner & Eric Skinner

Austin, Texas

cadexlegacy@cadexlegacy.com | cadexlegacy.com

Document version 1.0 — DRAFT for attorney review
Brackets [] indicate items requiring attorney finalization
This document is not legal advice and has not been reviewed by an attorney.