

Stupa Website Privacy Policy

Last Updated: 23rd March 2026

INTRODUCTION

Stupa Sports Analytics Private Limited (“**Stupa**”, “**we**”, “**us**”, or “**our**”) provides technology-driven sports analytics and tournament management solutions to enable sporting federations, universities and organizations (collectively, **Business Partners**) to collect, analyse, and visualize performance and logistical data. At Stupa, protecting the privacy of our clients, athletes, coaches, and visitors is a core business principle.

This Website Privacy Policy (“**Website Privacy Policy**”) details our use of personal data collected and processed when you (“**Site Visitor**”) visit www.stupasports.ai (our “**Website**”).

This Site Privacy Policy is a part of Stupa’s Terms of Service. Unless otherwise defined herein, all capitalized terms used in this Privacy Policy shall have the meanings ascribed to them in the Terms of Service.

If you have questions or concerns regarding this Site Privacy Policy, please contact us at support@stupaanalytics.com.

1. WHAT PERSONAL DATA DOES STUPA COLLECT?

Stupa collects personal data about any Site Visitor to our Site, apps, platforms, and Services, whether they are customer, athletes, or other visitors. The personal collected about our Site Visitors is referred to as “Visitor Data”. We will only require you to provide such personal data that is necessary for us to provide you with a Service at your request. The following Visitor Data is collected:

Visitor Data	Point of Collection
Name	Contact Us form submission; Chat via WhatsApp; During Demo
Email	Contact Us form submission;
Phone Number	Contact Us form submission; Chat via WhatsApp;
Organization	Contact Us form submission; During Platform Demo
Message Input	Contact Us form submission;
Sport Played	During Platform Demo
IP Address, device identifier, page visited, the time, the source of the request, the type of browser making the request, the preceding page view and other information about your engagement with our site and services.	<i>Automatically</i>

Cookies, cookie preference and session identifiers	When user provides consent or modifies cookie settings
Any additional information you put in the "How did you hear about us section?" in the Demo	During Platform Demo

2. HOW DO WE USE YOUR PERSONAL DATA?

We use Visitor Data to improve the features and security of our Site and Services. We use all Visitor Data strictly in accordance with this Site Privacy Policy. We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use your personal data.

If Stupa intends to use any personal data in a manner that deviates from this Site Privacy Policy, we will provide a notice of how we intend to use that specific personal data when we collect it. The use of that specific personal data will be limited to the use stated in the alternative disclosure. If Stupa plans to use your personal data for a new purpose that differs significantly from the one originally disclosed, we will provide you the option to opt out of such use.

We may use your Visitor Data:

(i) **For our legitimate interests:**

- a. to understand what services on our Sites interest you;
- b. to improve the user experience and to ensure that content is presented in the most effective manner for you and for your device;
- c. for system administration purposes and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- d. to improve the performance, features and security of our Site and services by analysing user behaviour; or
- e. to detection or prevention of fraud or misuse of our services or properties.

(ii) **For compliance with our legal obligations:**

- a. for law enforcement purposes;
- b. to protect our legal rights; or
- c. for compliance with a legal requirement or court order.

3. WITH WHOM DOES STUPA SHARE PERSONAL DATA?

We will share your personal data with third parties only in the ways that are described in this Site Privacy Policy. Stupa will provide individuals with reasonable mechanisms to exercise their choices. If Stupa plans to share your personal data with a third party not outlined in this Site Privacy Policy, we will provide you the option to opt out of such disclosure.

- (i) **Sub-Processors Acting on Our Behalf:** We may share some of your Visitor Information with other companies who provide us with technical and other services, and act as our agents that provide services to us (Sub-Processors). Stupa uses the Sub-Processors listed at <https://www.stupa.com/subprocessor-list/> (as updated from time to time) for the processing of personal data. They will be contractually granted access to only that Visitor Data which is necessary for them to perform their intended tasks. We do not share any personally identifiable information with third parties who are not our Sub-Processors.
- (ii) **For Legal Reasons:** We may disclose your personal data as required by law such as to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims and when we believe in good faith that disclosure is necessary to protect our rights, or to protect your safety or the safety of others. We may also share your Information to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service, or as otherwise required by law.
- (iii) **For Marketing:** We may share your email address with third parties for the limited purpose of (i) setting up a demo and (ii) showing our advertisements to you. Where required by law, we may do so only with your consent.
- (iv) **Business Restructuring:** If Stupa is involved in a merger, acquisition, or sale of all or a portion of its assets, we may share Visitor Data for this purpose.

Data collected by third parties is subject to their own privacy policies and privacy practices. Please check the privacy policies and terms of service / terms and conditions of any third-party website, app, software, or service that you choose to visit or use.

4. HOW DOES STUPA PROTECT PERSONAL DATA AND HOW LONG ARE THEY STORED?

We implement appropriate technical and organisational measures to protect personal data from unauthorised access, loss, alteration, or destruction, including the use of secure servers, firewalls, and encryption. Employees may only process personal data in line with this Site Privacy Policy and are subject to disciplinary action for non-compliance. We maintain internal procedures to address suspected data breaches and will notify affected individuals and regulators where legally required. Personal data is retained only as long as necessary for its purpose, after which it is securely deleted or returned. Retention periods are determined based on the nature and sensitivity of the data, processing purpose, potential risks, and legal obligations.

Data marked as no longer required is permanently deleted within 30 days. We may anonymise data for research or statistical purposes, allowing indefinite use without notice. Our website may include links to third-party sites, which operate under their own privacy policies. We are not responsible for the content or practices of such external sites.

5. WHAT ARE YOUR RIGHTS UNDER THIS POLICY?

In compliance with certain privacy laws, in particular the European General Data Protection Regulation (GDPR), you have certain rights in relation to your personal data. More specifically and under certain circumstances:

- (i) the right to request information about whether and which personal data is processed by us, and the right to request that such personal data is rectified or amended;

- (ii) the right to request that your personal data be deleted;
- (iii) the right to request that the processing of your personal data be restricted or object to the processing on grounds relating to his or her situation, or at any time for direct marketing purposes;
- (iv) withdraw your consent to the processing and use of your data completely or partially at any time with future application;
- (v) have the right to obtain your personal data in a common, structured and mechanically readable format, and to transmit those data to another controller;
- (vi) contact our data protection officer if there are any questions, comments, complaints or requests in connection with our statement on data protection and the processing of your personal data; and
- (vii) the right to complain to the supervisory authority responsible, if believed that the processing of your personal data is in violation of the legislation.

We will handle any request to exercise your rights in accordance with applicable law and any relevant legal exemptions. If you wish to exercise any of these rights or have any questions, please email support@stupaanalytics.com.

6. CHILDREN'S DATA

None of our services are intentionally directed at children under 16. We do not knowingly collect personal data from anyone under 16 years of age. If we become aware that we have unknowingly collected personal data from a child under the age of 16, we will make reasonable efforts to delete such information from our records.

7. COOKIES, WEB BEACONS, AND OTHER TRACKING TECHNOLOGIES.

As is true of most websites and services, we gather certain information automatically and store it in log files in order to improve the features and security of our products and services. This information may include Internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data, etc. We do not link this automatically collected data to other information we collect about you.

We, and third parties on our website, also use cookies and other tracking technologies. For information about the use of cookies and other tracking technologies on our website and Service(s), please see our Cookie Policy, incorporated herein by reference. You can control the use of cookies as described in the Cookie Policy, but disabling cookies may limit your use of certain features or functions on our website or service.

8. MODIFICATION

As we are constantly improving our services and expanding our business, we retain the right to modify this Site Privacy Policy at any time. Our latest Site Privacy Policy can always be found at our Site. We encourage you to periodically review this page for the latest information on our privacy practices.

9. CONTACT US

If you have questions about this Privacy Policy, you can contact us at support@stupaanalytics.com.