

PERSONAL DATA PROTECTION POLICY — SHADOWPASS

Version 1.0 — In effect as of 5 August 2026.

ShadowPass — ticketing and event management platform for dance battles.

Bilingual document (French / English). In case of conflicting interpretation, the French version prevails.

This policy describes how the ShadowPass platform collects, uses and protects the personal data of its users, in accordance with Regulation (EU) 2016/679 (GDPR) and the French Data Protection Act.

This personal data policy was drawn up by Shadowpass EI, a sole proprietorship whose registered office is located at 32 rue du chaussy, 95200 Sarcelles, registered with the Paris Trade and Companies Register under number 888 455 565.

1. DATA CONTROLLER

ShadowPass acts primarily as a platform providing an event management solution, as an agent and transparent intermediary acting in the name and on behalf of event organizers. As part of its solution, ShadowPass also connects Clients.

2. PERSONAL DATA COLLECTED

Depending on your use of the Service, ShadowPass is the data controller, within the meaning of the Regulation, for the following personal data:

- Identity and account data: last name, first name, email address, password (stored in encrypted form), date of birth where applicable.
- Dancer profile data: dancer name, crew, dance styles, profile picture, city.
- Registration and participation data: events, categories, tickets, teams, results, points and rankings.
- Payment data: transactions are processed by secure providers (Stripe, PayPal). We do not store any card data.
- Authentication data: credentials managed via our identity provider, sign-in via Google.
- Technical data: IP address, connection logs, browser or device type, push notification token (Firebase Cloud Messaging) if you accept notifications.

• 2.1 DATA CONCERNING CLIENTS/PARTICIPANTS ONLY

- Client/Participant profile (upcoming Events, past Events, “liked” Events, list of followers (friends) and followings (friends, organizers), profile picture, biography, past Events, activity statistics including ranking)
- The User may at any time change the visibility of their profile by choosing between a “Public” or “Private” profile from their Account settings, via the “

Privacy” section.

When the profile is set to “Public”, the profile information is accessible to all Users of the Platform.

When the profile is set to “Private”, the profile information is accessible only to followers previously accepted by the User. The User may also hide certain information relating to their activity from their followers in a granular manner from the privacy settings.

- **2.2 Data concerning Organizers only**

- Organizer profile (types of Events organized);
- Information relating to the Events offered (name, date and venues of the Events, the artists associated with the Event);
- Information relating to the transactions carried out (number of Tickets issued, total theoretical revenue, number of operations,

3. PURPOSES AND LEGAL BASES

Each processing activity relies on a legal basis within the meaning of Article 6 of the GDPR:

- Account management, registrations, ticketing and access to the Service: performance of the contract.
- Rankings, points system and public profiles: performance of the contract and legitimate interest in operating the community.
- Sending push notifications and non-essential communications: consent, revocable at any time.
- Security, fraud prevention and improvement of the Service: legitimate interest.
- Accounting, tax and legal obligations: legal obligation.

4. ANONYMITY AND DATA VISIBILITY

ShadowPass strictly distinguishes public data from private data:

- Public data: dancer name and crew. These appear in profiles, rankings, searches and organizer views.
- Private data: legal name and email address. These are never displayed publicly.
- An organizer can only see a participant’s legal name and email for the events that participant has registered for, and solely for management purposes (check-in, official lists, practical contact).

In the event of a dispute (fraud, report, contested result), the organizer concerned and the ShadowPass team may access the legal identity for verification purposes.

5. RECIPIENTS AND PROCESSORS

Your data is never sold. It is accessible to authorized personnel of the publisher and to the following processors, acting on instruction and under GDPR-compliant agreements:

- Identity / authentication provider: Google
- Payment providers: Stripe, PayPal.
- Push notifications: Google Firebase Cloud Messaging.
- Hosting and infrastructure: Hostinger/OVH in Europe.
- Event organizers: data controllers for the data of participants in their own events.

6. TRANSFERS OUTSIDE THE EUROPEAN UNION

Certain processors (notably for payment or notifications) may process data outside the European Union. Such transfers are governed by appropriate safeguards: the European Commission's standard contractual clauses or an adequacy decision.

7. RETENTION PERIODS

In accordance with the GDPR's storage limitation principle, ShadowPass retains Personal Data for the period strictly necessary to achieve the purposes for which it was collected. Beyond that period, the data is either anonymized or deleted, unless there is a legal obligation to retain it in archived form

- User account: the data associated with the creation and management of the account (credentials, contact details, login information) is retained for the entire lifetime of the account. In the event of inactivity, it is deleted 2 years after the last interaction with the platform, and 3 years after the last purchase made.
- Registration and results data: retained for the consistency of rankings; identifying elements may be anonymized.
- Newsletters and marketing communications: the data used for communication purposes (email address, contact preferences) is retained until consent is withdrawn, or for 3 years from the last contact with the user.
- Billing data: retained for the statutory accounting retention period (generally 10 years).
- Technical and security logs: limited retention, generally a few months to a year.

8. SECURITY

- Encryption of communications (HTTPS/TLS) and passwords.
- Role-based access control and multi-city segregation for organizers.
- Use of certified payment providers (no card data stored by the Platform).
- Measures to prevent unauthorized access, overloads and abuse.

9. COOKIES AND TRACKERS

The Platform uses cookies and similar technologies strictly necessary for its operation (session, authentication, security). Non-essential trackers, where applicable, are only set after obtaining your consent.

10. YOUR RIGHTS

In accordance with the GDPR, you have the following rights over your data:

- Right of access and rectification.
- Right to erasure (right to be forgotten).
- Right to restriction and right to object.
- Right to data portability.
- Right to withdraw your consent at any time.
- Right to set guidelines for the fate of your data after your death.

You can exercise these rights by contacting contact@shadow.digital. You can also delete your account directly from the Service (confirmation required).

11. COMPLAINT TO THE CNIL

If you believe that the processing of your data is not compliant, you may lodge a complaint with the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 place de Fontenoy, 75007 Paris, www.cnil.fr.

12. MINORS

The Service is not intended for minors under 15 without the authorization of a holder of parental authority. No data is knowingly collected from a child outside this framework.

13. CHANGES TO THE POLICY

This policy may be updated for legal, technical or Service-evolution reasons. Users are informed of material changes; the date of the last update appears in the footer.