

Privacy Policy

Last updated: April 13, 2026

California Notice at Collection / State Privacy Rights Notice:

This notice supplements our Privacy Policy and provides additional information for California residents.

Capy Holdings Inc d/b/a Capy Gaming (“Capy Gaming,” “we,” “us,” or “our”) operates an online gaming platform that provides users with online social casino-style games utilizing a dual virtual currency system, including non-redeemable Orange Coins and promotional Capy Coins that may be eligible for redemption in accordance with applicable sweepstakes rules. This Privacy Policy describes how Capy Gaming processes personal information that we collect through our digital or online properties or services that link to this Privacy Policy (including our www.capyspin.us website, our online casino platform, and our social media pages) as well as through our marketing activities and other activities described in this Privacy Policy (collectively, the “Service”).

While our www.capyspin.us website is available throughout the United States, we currently do not permit users in the following states to sign up for a Capy Gaming account: **Connecticut, California, Idaho, Louisiana, Michigan, Montana, Nevada, New Jersey, New York, and Washington.**

Capy Gaming may provide additional or supplemental privacy policies to individuals for specific products or services at the time we collect personal information.

Personal information we collect

Information you provide to us. Personal information you may provide to us through the Service or otherwise includes:

- Contact data, such as your first and last name, email address, address, and phone number.
- Profile data, such as the username and password that you may set to establish an online account on the Service, date of birth, state of residency, photograph of your ID card or passport, and any other information that you add to your account profile.
- Communications data based on our exchanges with you, including when you contact us through the Service, your communications with other users of the Service, social media, or otherwise.

- Transactional data, such as information relating to or needed to complete your purchases on or through the Service, including purchase numbers and transaction history.
- Marketing data, such as your preferences for receiving our marketing communications and details about your engagement with them.
- Payment data needed to complete transactions, including payment card information or bank account number. Payment information is processed directly by third-party payment processors and is not stored by Capy Gaming except as necessary for transaction records and compliance purposes.
- Sweepstakes and promotions data, including information you share when you enter our sweepstakes or promotions.

If you participate in a sweepstakes or promotions, we may ask you for your Contact Data to notify you if you win or not, to verify your identity, determine your eligibility, and/or to send you prizes. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and promotions are voluntary. We recommend that you read our [Sweepstakes Rules](#) for additional information.

Personal information that we infer from other personal information about you and other information that we process, including information we obtain from other sources.

Other data not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Third-party sources. We may obtain personal information falling within one of the categories identified above from third-party sources, such as:

- Public sources, such as government agencies, public records, social media platforms, and other publicly available sources.
- Partners, such marketing partners, event co-sponsors and fraud prevention providers.
- Business transaction partners. We may receive personal information in connection with an actual or prospective business transaction. For example, we may receive your personal information from an entity we acquire or are acquired by, a successor, or assignee or any party involved in a business transaction such as a merger, acquisition, sale of assets, or similar transaction, and/or in the context of an insolvency, bankruptcy, or receivership.

Automatic data collection. We may collect geolocation data to verify a user's location for compliance with applicable laws and platform restrictions. We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and your interaction over time with the Service, our communications and other online services, such as:

- Device data, such as your computer or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, CPU usage, device type (e.g., phone, tablet), IP address, unique identifiers (including identifiers used for advertising purposes), language settings, mobile device carrier, radio/network information (e.g., Wi-Fi, LTE, 3G), and general location information such as city, state or geographic area.
- Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times and duration of access, and whether you have opened our emails or clicked links within them.
- Communication interaction data such as your interactions with our emails or other communications (e.g., whether you open and/or forward emails) – we may do this through use of pixel tags (which are also known as clear GIFs), which may be embedded invisibly in our emails.

For more information concerning our automatic collection of data, please see the [Tracking technologies](#) section below.

Tracking Technologies

Cookies and other technologies. Some of the automatic collection described above is facilitated by the following technologies:

- Cookies, which are small text files that websites store on user devices and that allow web servers to record users' web browsing activities and remember their submissions, preferences, and login status as they navigate a site. Cookies used on our sites include both "session cookies" that are deleted when a session ends, "persistent cookies" that remain longer, "first party" cookies that we place and "third party" cookies that our third-party business partners and service providers place.
- Local storage technologies, like HTML5, that provide cookie-equivalent functionality but can store larger amounts of data on your device outside of your browser in connection with specific applications.

- Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.

For information concerning your choices with respect to the use of tracking technologies, see the [Your choices](#) section below.

How we use your personal information

We may use your personal information for the following purposes or as otherwise described at the time of collection:

- **Service delivery and operations.** We may use your personal information to:
 - provide the Service;
 - enable security features of the Service;
 - establish and maintain your user profile on the Service;
 - communicate with you about the Service, including by sending Service-related announcements, updates, security alerts, and support and administrative messages;
 - communicate with you about events, sweepstakes, or promotions in which you participate; and
 - provide support for the Service, and respond to your requests, questions and feedback.
- **Service personalization,** which may include using your personal information to:
 - understand your needs and interests;
 - personalize your experience with the Service and our Service-related communications; and
 - remember your selections and preferences as you navigate webpages.
- **Service improvement, research, and analytics.** We may use your personal information to analyze your usage of the Service, improve the Service, improve the rest of our business, help us understand user activity on the Service, including which pages are most and least visited and how visitors move around the Service, as well as user interactions with our emails, and to research and develop new products and services. For example, we use Google Analytics for this purpose. You can learn more about Google Analytics and how to prevent the use of Google

Analytics relating to your use of our sites

here: <https://tools.google.com/dlpage/gaoptout?hl=en>.

- **Marketing and advertising.** We, our service providers and our third-party advertising partners may collect and use your personal information for marketing and advertising purposes:
 - Direct marketing. We may send you direct marketing communications and may personalize these messages based on your needs and interests. You may opt-out of our marketing communications as described in the [Opt-out of marketing](#) section below.
 - Targeted advertising. We and our third-party advertising partners may use cookies and other tracking technologies to collect information about your interaction (including the data described in the automatic data collection section above) with the Service, our communications and other online services over time, and use that information to serve online ads that they think will interest you. This is called targeted advertising. We may also share information about our users with these companies to facilitate targeted advertising to those or similar users on other online platforms. You can learn more about your choices for limiting targeted advertising in the [Your choices](#) section below.
- **Events, sweepstakes, and promotions.** We may use your personal information to:
 - administer sweepstakes and promotions;
 - communicate with you about sweepstakes or promotions in which you participate; and
 - contact or market to you after collecting your personal information at an event.
- **Compliance and protection.** We may use your personal information to:
 - comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas, investigations or requests from government authorities;
 - protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
 - audit our internal processes for compliance with legal and contractual requirements or our internal policies;

- enforce the terms and conditions that govern the Service; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
- **To create aggregated, de-identified and/or anonymized data.** We may create aggregated, de-identified and/or anonymized data from your personal information and other individuals whose personal information we collect. We make personal information into de-identified and/or anonymized data by removing information that makes the data identifiable to you and we will not attempt to reidentify any such data. We may use this aggregated, de-identified and/or anonymized data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.
- **Further uses.** In some cases, we may use your personal information for further uses, in which case we will ask for your consent to use of your personal information for those further purposes if they are not compatible with the initial purpose for which information was collected.

Retention

We generally retain personal information to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes. To determine the appropriate retention period for personal information, we may consider factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have collected about you, we may either delete it, anonymize it, or isolate it from further processing.

How we share your personal information

We may share your personal information with the following parties and as otherwise described in this Privacy Policy, in other applicable notices, or at the time of collection.

- **Service providers.** Third parties that provide services on our behalf or help us operate the Service or our business (such as ID verification, hosting, information technology, customer support, email delivery, marketing, consumer research and website analytics).

- **Payment processors.** Any payment card information you use to make a purchase on the Service is collected and processed directly by our payment processors, such as Nuvei. These parties may use your payment data in accordance with their privacy policy:
 - Nuvei: <https://www.nuvei.com/legal/privacy-notice>
- **Advertising partners.** Third-party advertising companies for the **targeted advertising** purposes described above.
- **Third parties designated by you.** We may share your personal information with third parties where you have instructed us or provided your consent to do so.
- **Partners.** Third parties with whom we partner, including parties with whom we co-sponsor events or promotions, with whom we jointly offer products or services, or whose products or services may be of interest to you.
- **Professional advisors.** Professional advisors, such as lawyers, auditors, bankers and insurers, where necessary in the course of the professional services that they render to us.
- **Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the **Compliance and protection purposes** described above.
- **Business transferees.** We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Capy Gaming, financing of Capy Gaming, stock offerings, or the sale, transfer or merger of all or part of our business, assets, or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Capy Gaming as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Your choices

In this section, we describe the rights and choices available to all users. Users who are located in certain U.S. states can find additional information about their rights below.

- **Access or update your information.** If you have registered for an account with us through the Service, you may review and update certain account information by logging into your account.
- **Opt-out of communications.** You may opt-out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email, or by [contacting us](#). Please note that if you choose to opt-out of marketing-related emails, you may continue to receive service-related and other non-marketing emails.
- **Cookies and other technologies.** Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Service may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org. You can also configure your device to prevent images from loading to prevent web beacons from functioning.
- **Blocking images/clear gifs:** Most browsers and devices allow you to configure your device to prevent images from loading. To do this, follow the instructions in your particular browser or device settings.
- **Advertising choices.** You may be able to limit use of your information for targeted advertising through the following settings/options/tools:
 - Browser settings. Changing your internet web browser settings to block third-party cookies.
 - Privacy browsers/plugin-ins. Using privacy browsers and/or ad-blocking browser plug-ins that let you block tracking technologies.
 - Platform settings. Certain platforms offer opt-out features that let you opt-out of use of your information for targeted advertising purposes. For example, you may be able to exercise that option for Google and Facebook, respectively, at the following websites:
 - Google: <https://adssettings.google.com/>
 - Facebook: <https://www.facebook.com/about/ads>
 - Ad industry tools. Opting out of targeted ads from companies that participate in the following industry opt-out programs:

- Network Advertising Initiative: http://www.networkadvertising.org/managing/opt_out.asp
- Digital Advertising Alliance: <https://optout.aboutads.info/>
- Mobile settings. Using your mobile device settings to limit use of the advertising ID associated with your mobile device for targeted advertising purposes.

You will need to apply these opt-out settings on each device and browser from which you wish to limit the use of your information for targeted advertising purposes.

We cannot offer any assurances as to whether the companies we work with participate in the opt-out programs described above.

Do Not Track. Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" signals. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

Declining to provide information. We need to collect personal information to provide certain services. If you do not provide the information we identify as required or mandatory, we may not be able to provide those services.

Other sites and services

The Service may contain links to websites, mobile applications, and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites, mobile applications or online services operated by third parties, and we are not responsible for their actions. We encourage you to read the privacy policies of the other websites, mobile applications and online services you use.

Security

We employ technical, organizational and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies, and we cannot guarantee the security of your personal information.

International data transfer

We are headquartered in the United States and may use service providers that operate in other countries. Your personal information may be transferred to the United States or other locations where privacy laws may not be as protective as those in your state, province, or country.

Children

The Service is not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom we have collected personal information in a manner prohibited by law, please [contact us](#). If we learn that we have collected personal information through the Service from a child without the consent of the child's parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service or other appropriate means. Any modifications to this Privacy Policy will be effective upon our posting the modified version (or as otherwise indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Privacy Policy indicates your acknowledging that the modified Privacy Policy applies to your interactions with the Service and our business.

How to contact us

Email: support@capyspin.us

Mail: 6260 Spring Mountain Rd Ste 100 Las Vegas, NV 89146-8867

State privacy rights notice

Except as otherwise provided, this section applies to residents of California, Colorado, Nevada, Oregon, Texas, Utah, Virginia, and other states to the extent they have privacy laws applicable to us that grant their residents the rights described below (collectively the "State Privacy Laws").

This section describes how we collect, use, and share Personal Information of residents of the states listed above and the rights these users may have with respect to their Personal Information. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of one of these states listed above, you may not be able to exercise these rights. In addition, we may not be able to process your request if you do not

provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.

For purposes of this section, the term "Personal Information" has the meaning given to "personal data", "personal information" or other similar terms, and "Sensitive Personal Information" has the meaning given to "sensitive personal information", "sensitive data", or other similar terms in the State Privacy Laws, except that in neither case does such term include information exempted from the scope of the State Privacy Laws. In some cases, we may provide a different privacy notice to certain categories of residents of the states listed above, such as employees or job applicants, in which case that notice will apply instead of this section.

Your privacy rights. The State Privacy Laws may provide residents with some or all of the rights listed below. However, these rights are not absolute, and some State Privacy Laws do not provide these rights to their residents. Therefore, we may decline your request in certain cases as permitted by law.

- **Information.** You may have the right to request the following information about how we have collected and used your Personal Information during the past 12 months or the timeframe provided by applicable State Privacy Laws:
 - The categories of Personal Information that we have collected.
 - The categories of sources from which we collected Personal Information.
 - The business or commercial purpose for collecting and/or selling Personal Information.
 - The categories of third parties with which we share Personal Information.
 - The categories of Personal Information that we sold or disclosed for a business purpose.
 - The categories of third parties to whom the Personal Information was sold or disclosed for a business purpose.
- **Access.** You may have the right to request a copy of the Personal Information that we have collected about you.
- **Appeal.** You may have the right to appeal our denial of any request validly submitted.
- **Correction.** You may have the right to ask us to correct inaccurate Personal Information that we have collected about you.

- **Deletion.** You may have the right to ask us to delete the Personal Information that we have collected from and/or about you.
- **Opt-out.**
 - Opt-out of certain processing for targeted advertising purposes. You may have the right to opt-out of certain processing of Personal Information for targeted advertising purposes.
 - Opt-out of profiling/automated decision making. You may have the right to opt-out of automated processing or profiling performed on Personal Information to evaluate, analyze, or predict personal aspects related to a person's economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.
 - Opt-out of other sales of Personal Information. You may have the right to opt-out of other sales of your Personal Information. While we may use your Personal Information for targeted advertising purposes, we do not sell your Personal Information for monetary consideration, as described further below.
- **Consumers under 16.** We do not have actual knowledge that we sell or share for targeted advertising purposes the Personal Information of consumers under 16 years of age.
- **Sensitive Personal Information.** We do not process Sensitive Personal Information for the purpose of inferring characteristics about consumers under the California Consumer Privacy Act ("CCPA").
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the State Privacy Laws.

Exercising your right to information/know, access, appeal, correction, deletion, or make changes with respect to your consents. You may submit requests to exercise your right to information/know, access, appeal, correction, deletion, or make changes with respect to your consent via email to support@capyspin.us

Exercising your right to opt-out of the "sale" or "sharing" of your Personal Information. While we do not sell Personal Information for money, like many companies, we use services that help deliver targeted ads to you as described above. The State Privacy Laws may classify our use of some of these services as "selling" or "sharing" your Personal Information with the advertising partners that provide the services. You can by submit requests to opt-out of tracking for targeted advertising purposes or other sales of Personal

Information by visiting our Do Not Sell or Share My Personal Information webpage, via email to support@capyspin.us or by broadcasting the global privacy control signal from your browser.

Verification of Identity; Authorized agents. We may need to verify your identity in order to process your information/know, access, appeal, correction, or deletion requests and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Under some State Privacy Laws, you may enable an authorized agent to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your State Privacy Laws rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

Personal information that we collect, use and disclose

We have summarized the Personal Information we collect and may disclose to third parties by reference to both the categories defined in the "Personal information we collect" section of this Policy above and the categories of Personal Information specified in the CCPA (Cal. Civ. Code §1798.140). This describes our practices currently and during the 12 months preceding the effective date of this Privacy Policy. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of Personal Information not described below.

Personal Information ("PI") we collect	CCPA statutory category	Categories of third parties to whom we "disclose" PI for a business purpose	Categories of third parties to whom we "sell" or "share" PI
Contact data	Identifiers Commercial information	Service providers Payment processors	Advertising partners (to

	California customer records	Advertising partners Third parties designated by you Professional advisors Authorities and others Business transferees Partners	facilitate online advertising) Partners
Profile data	Identifiers Commercial information California customer records	Service providers Payment processors Advertising partners Third parties designated by you Professional advisors Authorities and others Business transferees Partners	Advertising partners (to facilitate online advertising) Partners
Communications data	Identifiers Commercial information California consumer records	Service providers Payment processors Advertising partners Third parties designated by you	Advertising partners (to facilitate online advertising) Partners

	Internet or Network Information	Professional advisors Authorities and others Business transferees Partners	
Transactional data	Commercial information California consumer records Financial information	Service providers Payment processors Advertising partners Third parties designated by you Professional advisors Authorities and others Business transferees Partners	Advertising partners (to facilitate online advertising) Partners
Marketing data	Identifiers Commercial information California customer records Internet or Network Information	Service Providers Payment processors Professional advisors Authorities and others Business transferees Partners	Advertising partners (to facilitate online advertising) Partners

<p>Payment data</p>	<p>Commercial information</p> <p>Financial information</p> <p>California consumer records</p>	<p>Service providers</p> <p>Payment processors</p> <p>Advertising partners</p> <p>Third parties designated by you</p> <p>Professional advisors</p> <p>Authorities and others</p> <p>Business transferees</p> <p>Partners</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Partners</p>
<p>Sweepstakes and promotions data</p>	<p>Identifiers</p> <p>Commercial information</p> <p>California customer records</p> <p>Internet or Network Information</p>	<p>Service providers</p> <p>Payment processors</p> <p>Professional advisors</p> <p>Authorities and others</p> <p>Business transferees</p> <p>Partners</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Partners</p>
<p>Device data</p>	<p>Identifiers</p> <p>Internet or Network Information</p>	<p>Service providers</p> <p>Payment processors</p> <p>Advertising partners</p> <p>Third parties designated by you</p> <p>Professional advisors</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Partners</p>

		<p>Authorities and others</p> <p>Business transferees</p> <p>Partners</p>	
Online activity data	<p>Identifiers</p> <p>Commercial information</p> <p>Internet or Network Information</p>	<p>Service providers</p> <p>Payment processors</p> <p>Advertising partners</p> <p>Third parties designated by you</p> <p>Professional advisors</p> <p>Authorities and others</p> <p>Business transferees</p> <p>Partners</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Partners</p>
Communication interaction data	<p>Identifiers</p> <p>Commercial information</p> <p>California consumer records</p> <p>Internet or Network Information</p>	<p>Service providers</p> <p>Payment processors</p> <p>Advertising partners</p> <p>Third parties designated by you</p> <p>Professional advisors</p> <p>Authorities and others</p> <p>Business transferees</p> <p>Partners</p>	<p>Advertising partners (to facilitate online advertising)</p> <p>Partners</p>

Data derived from the above	Inferences	Service providers Advertising partners Authorities and others Business transferees Partners	Advertising partners (to facilitate online advertising) Partners
Other Sensitive Personal Information	Protected Classification Characteristics	N/A	None

Additional information for Nevada residents. Nevada residents have the right to opt-out of the sale of certain personal information for monetary consideration. While we do not currently engage in such sales, if you are a Nevada resident and would like to make a request to opt-out of any potential future sales, please email support@capyspin.us

Do Not Sell or Share My Personal Information

Depending on your state of residency, you may be able to request to opt-out of the sharing of your personal information for cross-contextual targeted advertising purposes (hereinafter, "Sharing" or "Shared") and/or from the sale of your personal information for monetary or other valuable consideration (hereinafter, "Sell," "Sales," or "Sold").

If you would like to exercise your right to opt-out of the Sharing of your personal information, you may submit your request below. You may also enable an authorized agent to submit an opt-out request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. Please note that, while we may Share your personal information for cross-contextual targeted advertising purposes, we do not otherwise Sell personal information for monetary consideration.

Submit your opt-out request:

- [Click here](#) to submit a request

You may also choose to enable online, where available, a global privacy control signal that automatically broadcasts your opt-out preferences ("GPC Signal"). We will process the GPC Signal as a request to opt-out.

Please note that opting-out will not:

- disable cookies or other technologies that facilitate the functioning of our Service or collect data for purposes that do not involve the Sharing or Sales of personal information under applicable state consumer privacy laws; or
- prevent you from seeing interest-based ads that rely on information that, for applicable state consumer privacy law purposes, was not Shared or Sold, was Shared or Sold before you opted-out, or was Shared or Sold by third parties acting outside of our control.

If you opt-out, please note that the opt-out is specific to each browser, account, and device, so you will need to opt-out on every browser and device that you use, as well as the account that you maintain on our Service. If you visit our Service after clearing your cookies and you do not login to your account, you will need to opt-out again.