

PRIVACY POLICY

Effective as of: July 01 2023

This Privacy Policy applies to information collected by the Bigly, LLC with registered office at 611 South DuPont Highway Suite 102, Dover, Delaware, United States, 19901 (the “Company” or “we” or “us”), our brands and services, and any affiliated or subsidiary companies (the “Company,” “we” or “us”), offline or online, including, but not limited to all our websites or apps that post a link to this Privacy Policy (collectively, “the Sites”).

At Bigly LLC we highly value our relationship with You and admire your concerns about your privacy.

Please read our Privacy Policy below to know more about what the types of personal data we collect, how we use and process your personal data, the legal basis for processing, and with whom we share your personal information. In this Privacy Policy you will also find how you can reach us to update your contact information, remove your name from our mailing lists, or get answers to questions you may have about our privacy practices.

Please read this Privacy Policy carefully.

By continuing to interact with our Sites or providing personal information to us after having an opportunity to review this Privacy Policy, you are agreeing to the practices described in this Privacy Policy and you promise us that

- (i) you have read, understand and agree to this privacy policy,
 - (ii) you are over 18 years of age (or have had your parent or guardian read and agree to this privacy policy for you).
- If you do not agree, or are unable to make this promise, you must not use our Sites or Service. In such case, you must
- (a) delete your account and contact us and request deletion of your data;
 - (b) cancel any subscriptions using the functionality provided by Apple (if you are using iOS) or Google (if you are using Android), any other app stores that may be available from time to time, or by us if you purchased it directly from our websites; and
 - (c) delete our App from your devices.

The Company and its Sites are located in the United States. Information collected on our website and applications is stored in the United States; therefore, your information may become subject to U.S. law.

By using our websites, our mobile applications or any of our platforms, including social media and newsletters, you consent to the transfer of your data overseas and across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. The laws governing data in your home country may differ from those in the countries to which data is transferred. By accessing and using our website and mobile applications, you consent to the transfer of your data in this manner.

Any translation from English version is provided for your convenience only.

In the event of any difference in meaning or interpretation between the English language version of this Privacy Policy available at <https://girl-power-club.com/privacy-policy>, and any translation, the English language version will prevail. The original English text shall be the sole legally binding version

If any questions will remain unanswered or you would like to exercise your privacy rights, please contact us at support@girl-power-club.com

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1. PERSONAL DATA WE COLLECT

We collect data you give us voluntarily – for example, when you send us an email or choose your areas for improvement. We also may receive data about you from third parties – for example, when you sign in via Apple. And also we collect data automatically – for example, your IP address.

When we use the terms "personal information" or "personal data" in this Privacy Policy, we are referring to information that identifies, relates to, describes, or is reasonably capable of being associated, directly or indirectly, with an individual. It does include information that has been modified in a substantial way so that it no longer can reasonably identify or be linked to an individual.

1.1. DATA YOU GIVE US

1.1.1. BASIC PERSONAL INFORMATION

You provide us information about yourself when you register for and/or use the Service – for example, your name, age, gender, email address.

1.1.2. PHYSICAL CHARACTERISTICS AND PREFERENCES

Also you provide us data on physical characteristics – for example, height, weight, areas for improvement, fitness level, and food preferences – for example, diet preferences, preferred number of meals, foods you do not like. And also your preferences in meditation, yoga and other physical activity.

1.1.3. PRECISE GEOLOCATION INFORMATION

We may offer products and services that require us to collect your precise geolocation. In such instances, you may be required to allow us to collect your precise geolocation, with your knowledge and consent, to provide you with that

product or service. If you choose not to provide us with your precise geolocation information, these products and services will not function properly, and we will not be able to provide them to you.

We will also use this precise geolocation information for analytics purposes and will share your precise geolocation information with certain third parties, including, but not limited to, dealers and parties who provide targeted advertising and analytics services.

1.1.4. NEWSLETTERS, MESSAGES AND OTHER COMMUNICATIONS

We may offer online newsletters, messages and other communications or reoccurring emails, with information about healthy habits and lifestyle, trainings plans, meal plans, and also promotion information about our products and services. When you sign up to receive these communications, we ask you for personal information, such as your name, phone number and email address. We will use the information to send you the communications you request and to communicate with you about our products and services.

1.1.5. SOCIAL MEDIA, SURVEYS, OR CONTESTS

We may offer you the opportunity to participate in social media, online surveys, solicitations, or contests. Information we request includes contact information (such as your e-mail address), photos, health status, weight loss, demographic information, videos and diet/workout plans. Participation in social media, surveys, solicitations, or contests is completely voluntary. Therefore, you have a choice as to whether to disclose any information. We, our business partners will use the information provided to notify contest winners and award prizes, to monitor or improve the use of one or more websites or advertising, and to provide aggregated information for marketing analyses. By submitting information to us via contests, social media, or directly, you grant the Company an unlimited non-exclusive license to utilize your photo and success story in a variety of marketing mechanisms without attribution or royalty. We may utilize said data, except for your name and contact information, to create new intellectual property and/or programs without attribution or royalty. That being said, upon your request we will remove any identifiable information, photos, or plans from any digital distribution mechanism within 30 days.

1.1.6. INFORMATION WE COLLECT USING COOKIES AND OTHER TECHNOLOGIES

We collect certain information by automated means when you visit our Sites, such as how many users visited our Sites and the pages accessed. By collecting this information, we learn how to best tailor our Sites to our visitors. We collect this information through various means such as “cookies” and “web beacons.” In addition, we may collect IP addresses, as explained below. For more information regarding our use of cookies, please refer to our separate Cookie Policy.

1.2. DATA PROVIDED BY THIRD PARTIES

For improving the app and attracting users, we use third party solutions. As a result, we may process data using solutions developed by Facebook, Google, Apple, Amplitude, Firebase, Crashlytics, Appsflyer and others. Therefore, some of the data is stored and processed on servers of such third parties.

For example this enables us to analyze different interactions (the average weight and height of our users, how many users chose a particular product, how often users make subscriptions), serve ads (and to show them only to a particular group of users).

Consequently, we, in particular, better understand which of our content you like the most in what of our features you use more often and are able to focus on them to enhance your user experience.

1.2.1. THIRD-PARTY SITES

Our branded Services from time to time is offered for sale by authorized third-party partners through websites they own and control, which may be linked to the Sites. If you transact with an authorized third-party partner, your purchase will be conducted on our authorized third-party partner’s website, subject to the third- party’s Privacy Policies and Terms of Use. You should review the Privacy Policy and Terms of Use that apply to that third-party’s website, which will apply to your transaction.

1.2.2. THIRD-PARTY MOBILE APPS

When you use sign in with Apple to register an account in the App, we get personal data from your Apple ID account. Same, when you use sign in with Google to register an account in the App, we got personal data from your Google ID account. This data may include, in particular, your name and verified email address. You may choose to share your real email address or an anonymous one that uses the private email relay service. Apple or Google (depending on operational system of your device) will show you their detailed privacy information on the sign in with Apple/Google screen. Find more about sign with Apple [here](#) or Google [here](#).

1.2.3. PRODUCT FINANCING AND CREDIT REFINANCING

We may provide links to third-party vendors for product financing or credit refinancing information for some of our products. If such a link is provided, your information is transmitted directly to the third-party vendor and is not received by our companies. You should review the Privacy Policy and Terms of Use that apply to the third-party vendor's website.

1.2.4. REFERRAL SERVICE

From time to time, we may offer a referral service that allows you to inform your friends and other acquaintances about products and/or information contained on (or through) our websites. If you elect to use such a referral service, the following will apply; email address(es) will be collected for the purpose of sending an email for which you will be noted as the sender of such email. The Company will be a service provider facilitating such delivery.

1.3. DATA WE COLLECT AUTOMATICALLY

We collect certain information by automated means when you visit our Sites, such as how many users visited our Sites and the pages accessed. By collecting this information, we learn how to best tailor our Sites to our visitors. We collect this information through "Cookies", "Web Beacons", "Ads IDs", "Tracking Pixels" and various other means:

1.3.1. COOKIES

Cookies are small text files that are stored on a user's computer for record-keeping purposes. Cookies can be either persistent cookies or session cookies. A persistent cookie remains on your hard drive for an extended period of time. A session cookie expires when you close your browser. We also use tracking pixels that set cookies to assist with delivering online advertising.

Cookie data will be stored on your device and most of the times only for a limited time period.

Cookies are used, in particular, to automatically recognize you the next time you visit our Website. As a result, the information, which you have earlier entered in certain fields on the Website may automatically appear the next time when you use our Service.

1.3.2. ADS ID

We collect your Apple Identifier for Advertising ("IDFA") or Google Advertising ID ("AAID") (depending on the operating system of your device). You can typically reset these numbers through the settings of your device's operating system, but we do not control this.

1.3.3. DEVICE AND LOCATION DATA

We collect data from your mobile device. For example: IP address, time zone, language settings, type and model of a device, device settings, operating system, Internet service provider, mobile carrier, hardware ID, and Facebook ID.

1.3.4. DATA ABOUT HOW YOU FOUND US

We collect data about your referring app or URL (that is, the app or place on the Web where you were when you tapped on our ad).

1.3.5. USAGE DATA

We record how you interact with our Service. For example, we log your taps on certain areas of the interface, the features, and content you interact with, workouts you do, the time and duration of your workouts, how often you use the App, how long you are in the app, your training program progress, and your subscription orders. We also record the ads in our App which you interact.

1.3.6. FINANCIAL TRANSACTION DATA

When you make payments through the Service, you need to provide financial account data to our third-party service providers (such as your credit card information). We do not collect or store full credit card number data, though we may receive data about the transaction and credit card-related data, including: date, time and amount of the transaction, the type of payment method used.

2. FOR WHAT PURPOSES AND ON WHAT LEGAL BASIS WE PROCESS YOUR PERSONAL DATA

The personal data we collect is processed for the following purposes:

2.1. TO SERVE THE FUNCTIONS OF THE SITES AND PROVIDE YOU WITH OUR SERVICE

This includes analyzing the Sites' performance and functioning; enabling you to use the Service in a seamless manner and preventing or addressing Service errors or technical issues; and managing everyday business needs, such as administration and improvement of the Sites.

2.2. TO CONTACT YOU REGARDING YOUR USE OF SERVICE

We contact you, for example, by push notifications. These may include reminders and motivational messages encouraging you to follow your training and nutrition plan, or other information about the App. As a result, you may, for example, receive a push notification every day at a particular time reminding you to work out. To opt out of receiving push notifications, you need to change the settings on your device.

The services that we use for these purposes may collect data concerning when you interacted with our Sites, such as by clicking on links included in the message or just the date and time when the message was viewed by you.

We use "Intercom" service which provides us with message and customer service tools, which enable us to communicate with you within the App. When you chat with us via in-App chat, some of your information is automatically transferred to Intercom. Intercom uses your personal data to provide and fulfill its services. Intercom is [EU-US Privacy Shield certified](#). Read more about Intercom's approach to privacy in its [Privacy Policy](#).

We use Apple Push Notification service that is a notifications service provided by Apple. It allows us to send information to iOS devices. Please, check Apple's [Privacy policy](#).

2.3. TO ENFORCE OUR TERMS AND CONDITIONS OF USE AND TO PREVENT AND FRAUD

We may use and share your personal data with others (including law enforcement agencies) to enforce our agreements and contractual commitments, to detect, prevent, and combat fraud.

2.4. TO COMPLY WITH LEGAL OBLIGATIONS

We may process, use, or share your data when the law requires it, in particular, when a law enforcement agency requests your data by available legal means.

2.5. TO CUSTOMIZE YOUR USER EXPERIENCE

We process your personal data, in particular, such as your characteristics and preferences, to adjust the content of the Service and provide content tailored to your personal preferences.

2.6. TO MANAGE YOUR ACCOUNT AND PROVIDE YOU WITH CUSTOMER SUPPORT

We process your personal data to respond to your requests for technical support, refunds, Service information or to any other communication you initiate. This includes accessing your account to address technical support requests. For example we may send you notices regarding our Terms and Conditions of Use or this Privacy Policy. Also we may send you notifications or emails about the performance of our Service, security and payment transactions.

2.7. TO PROCESS USER'S PAYMENTS

We provide paid products and/or services within the Service. For this purpose, we use third-party services for payment processing. As a result of this processing, you will be able to make a payment for our Service and we will be notified that the payment has been made and will provide you with our Service. We will not store or collect your payment card details ourselves. This information will be provided directly to our third-party payment processors.

2.8. TO ANALYZE HOW YOU USE OUR SITES AND TO PERFORM OTHER MARKET RESEARCH

This enables us to better understand what features and training plans of the Services our users like more and what categories of users use our Services. Also this helps us to innovate, design, improve and develop the Service and our new products by analyzing our user's operations.

We also use data for statistical analysis purposes, to test our hypotheses and improve our offers. This helps us to improve the Service using the results obtained from this processing.

To analyze how visitors use the Service and to measure the effectiveness of some ads we use Google Analytics, a web analysis program of Google. On Google Analytics we get, for example, information on the data you enter on our Website and users' interactions within the Website. Google allows you to influence the collection and processing of the information generated by Google, in particular, by installing a browser plug-in, available [here](#). You can read more about how Google uses the information [here](#).

We use Facebook Analytics, which is a service is provided by Facebook that allows us to use different analytical tools. On Facebook Analytics we get, for example, insights on how many people launch our app, how often users make purchases and other interactions. Here you can find Facebook's [Privacy Policy](#).

To perform research and analysis about how users interact with our App we use “Appsflyer” which enables us to understand, in particular, how users find us (for example, who was the advertiser that delivered an ad to users, which led them to an app store with our App. Also it provides us with other analytics tools that enable us to research and analyze how users interact with our Service. Here is Appsflyer’s [Privacy Policy](#). Appsflyer allows you to [opt out](#) of having data from your device sent to AppsFlyer’s servers for apps usage collection.

We also use **Amplitude** that is an analytics service that we use to understand how customers use our Service. Amplitude collects various technical information, in particular, time zone, type of device (phone or tablet), unique identifiers (such as IDFA). Amplitude also allows us to track various interactions that occur in our App. As a result, Amplitude helps us to decide what features should we focus on (for example, if we see that most of the users focus on walking meditation workouts, we may develop more these). Amplitude is [EU-US Privacy Shield certified](#). Amplitude provides more information on how they process data in its [Privacy Policy](#).

We also use “Firebase Analytics”, which is an analytics service provided by Google. In order to get detailed information on Google’s use of data, consult Google’s [Partner Policy](#) and also [Firebase Privacy information](#) and [Google’s Privacy Policy](#). To perform standard product analysis, we also use “Fabric Answers”, which is an analytics service provided by Crashlytics, a business division of Google. Here you can find [Data Processing and Security Terms](#) and [Privacy information](#) of this service. And finally, to track and analyze behavior of our App’s users (in particular, how they react to changes of the App structure, text or any other component), we use Firebase Remote Config. Firebase Remote Config is an A/B testing and configuration service provided by Google, which also enables us to tailor the content that our App’s users see (for example, it allows us to show different onboarding screens to different users). Here you can find Firebase’s [Privacy Policy](#) and [Privacy and Security](#).

2.9. TO PROVIDE YOU WITH OUR MARKETING COMMUNICATIONS

We process your personal data to create and improve our marketing campaigns. As soon as we receive consent or otherwise establish legal basis for sending you marketing communications, we may add your email address to our marketing list. As a result, you will receive special offers and other promotional information about our products. If you do not want to receive marketing emails from us, you can unsubscribe following instructions in the footer of the marketing emails. We do not use health, motion, and fitness information gained through Apple Health Kit or Google Fit for marketing campaigns. We may also show you advertisements in our App, and send you push notifications for marketing purposes. To opt out of receiving such notifications you need to change the settings on your device.

2.10. TO MAKE YOUR ADS PERSONALIZED

We and our partners may use your personal data to tailor ads and show them to you at the relevant time. For example, if you have installed our App, you might see ads of our products, for example, in your Facebook’s feed. We never use information gained through Apple Health Kit or Google Fit to personalize our ads.

HOW TO OPT OUT PERSONALIZED ADVERTISING

If you use Android: To opt-out of ads on an Android device, simply open the Google Settings app on your mobile phone, tap “Ads” and enable “Opt out of interest-based ads”. In addition, you can reset your advertising identifier in the same section (this also may help you to see less of personalized ads).

If you use iOS: On your iPhone or iPad, go to “Settings,” then “Privacy” and tap “Advertising” to select “Limit Ad Track”. In addition, you can reset your advertising identifier (this also may help you to see less of personalized ads) in the same section.

Also we use Facebook Ads Manager together with Facebook Custom Audience, which allows us to choose audiences that will see our ads on Facebook or other Facebook’s products (for example, Instagram). Through Facebook Custom Audience we may create a list of users with certain sets of data, such as an IDFA, choose users that have completed certain actions in the App (for example, installed it). As a result, we may ask Facebook to show some ads to a particular list of users. As a result, more of our ads may show up while you are using Facebook or other Facebook’s products (such as Instagram). You may learn how to opt out of advertising provided to you through Facebook Custom Audience [here](#).

Facebook also allows its users to influence the types of ads they see on Facebook. To find how to control the ads you see on Facebook, please go [here](#).

Google Ads is an ad delivery service provided by Google that can deliver ads to users. In particular, Google allows us to tailor the ads in a way that they will appear, for example, only to users that have conducted certain actions with our App. Google allows its users to [opt out of Google’s personalized ads](#) and to [prevent their data from being used by Google Analytics](#).

We also use Snapchat Advertising Platform together with Snapchat Audience Based Match, which is an ad delivery service provided by Snapchat that can link the activity of some users of our App with the Snapchat advertising network and show some of our ads to them. Snapchat allows you to [Opt Out](#) of their audience based ads. Here’s Snapchat’s [Privacy Policy](#).

3. CHILDREN’S PRIVACY

Our Sites are not directed at children under the age of 18. You specifically recognize and consent that you are 18 years of age or older before using this Site. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 18, we will promptly delete that information. If you believe you or your child's information has been captured while under 18 years of age, please contact us immediately at support@girl-power-club.com and we will immediately remove this information.

4. YOUR RIGHTS – ACCESS & CORRECTION

You have the right to request access to the personal information we have collected about you for the purposes of reviewing, modifying, or requesting deletion of the information. You also have the right to request a copy of the information we have collected about you. In certain situations, you may also request that we restrict or cease processing your information.

If you would like to make a request to access, review, or correct the personal information we have collected about you, please contact us by emailing us at support@girl-power-club.com or through one of the methods in the "How to Contact Us" section, below.

To help protect your privacy and security, we will take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your information.

You will be notified of any actions taken on your personal information in response to a request submitted for modification, deletion, or restrictions on the processing of your personal information.

When data processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal. You also have a right to data portability when the data processing is based on a contract between you and the Company and the data was processed by automated means. You may exercise these rights by submitting a written request to support@girl-power-club.com, the Company will respond to your request within 30 days.

You have the right to lodge a complaint with the appropriate privacy or data protection regulator in your jurisdiction.

5. RETENTION OF PERSONAL INFORMATION

The Company will store your personal data for as long as it is reasonably necessary for achieving the purposes set forth in this Privacy Policy (including providing the Service to you), which includes (but is not limited to) the period during which you have an account with the App or/and an active Subscription to our Service. We will also retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

When deleting personal information based on a request by the data subject, the Company will make reasonable attempts to ensure that all instances of the information are deleted in their entirety. For requests for access, corrections, or deletion, please refer to the "HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS" section of this policy.

The Company maintains documentation, including a data processing activity register, to demonstrate compliance with its obligations and to allow audits, including inspections, to be carried out by the Company or another auditor it has mandated, and to participate in such audits.

6. WITH WHOM WE SHARE YOUR PERSONAL DATA

We share information with third parties that help us to market, provide, integrate, operate, improve and support our Service. We may share some sets of personal data, in particular, for purposes indicated in Section 2 of this Privacy Policy.

THE TYPES OF THIRD PARTIES WE SHARE INFORMATION WITH INCLUDE, IN PARTICULAR:

6.1. LAW ENFORCEMENT AGENCIES AND OTHER PUBLIC AUTHORITIES

We may use and disclose personal data to enforce our [Terms and Conditions](#), to

- (i) protect our rights, property and privacy, or that of our affiliates, you or others;
- (ii) to respond to requests from regulatory agencies, law enforcement agencies, courts and other public and government authorities;
- (iii) in other cases provided for by law.

6.2. SERVICE PROVIDERS

We share personal data with third parties that we hire to provide services or perform business functions on our behalf, based on our instructions. We share your personal information with the following types of service providers:

- (i) data analytics providers (Facebook, Google, AppsFlyer, Firebase, Crashlytics, Amplitude, Fabric);
- (ii) marketing partners (Facebook, Google, Snapchat, marketing agencies, email delivery services, other social media networks) ;
- (iii) payment processing providers;
- (iv) cloud storage providers;

- (v) measurement partners;
- (vi) communication services providers

6.3. THIRD PARTIES AS PART OF A MERGER OR ACQUISITION

We may buy or sell assets or business offerings as part of our business development. Customers' information is usually one of the transferred business assets in these types of transactions. We may also share such information with any affiliated entity and may transfer such information in the course of a corporate transaction, such as the sale of our business, consolidation or asset sale, a divestiture, merger, or in the unlikely event of bankruptcy.

6.4. HEALTH APPS (Apple Health, Apple Motion & Fitness API, Google Fit)

Provided you give express permission on your device, we may receive or/and share data about your activity with/from your Health Apps.

In some of our Apps, you may decide to allow us to receive the following information from the Health Apps (for example, the number of steps, covered distance, weight, and dietary energy). If you grant access for us to share data with your Health Apps, we will transfer to your Health App information on your workouts, weight, and calories intake.

Before you decide to share your data with the Health Apps, we encourage you to review their privacy policy, as your data will be subject to those policies.

You can withdraw our access to receive/share data from your Health Apps at any time directly in the Health Apps. We do not use the information gained through your Health Apps for advertising or similar services. Please find below more detailed information on how we process the information obtained from Health App and what happens when you decided to share your data with Health Apps.

When you share your Number of steps data from a Health App (Apple Health Kit or Google Fit), we compare it to the goal for daily steps you've set in the App. As a result, we provide you with a convenient way to access this information via App charts and access to aggregated information: for example, to track your weekly average steps for the day or for the week. We may also send you motivational messages reminding you that a certain amount of steps are left to meet your daily goal. We may even award you a badge in the App for fulfilling your step goal week in a row.

When you allow our App to access your Distance data from a Health App (Apple Health Kit or Google Fit), it may count and show the distance you cover during a distance workout.

When you allow our App to access your Weight data from a Health App (Apple Health Kit or Google Fit), We use this information to customize your App experience and help you to track your weight loss progress and also to adjust our weight loss suggestions (for example, daily number of steps, water intake goal).

You may also input this information manually in the App. But if you use, for example, smart weights and allow us to access your weight information from Health App, weight information in the App will automatically update each time you use your smart weights.

Also when you allow our App to access your data from Dietary energy (Apple Health Kit; Google Fit), we may not only use this information to show you the statistics of consumed calories, but also to provide you with recommendations on the approximate number of calories you should eat to achieve your goals and to demonstrate how many of them were "eaten" during the day.

When you give a permission to our App to share/transfer your data on your current Weight, Dietary energy (how many calories you consume according to information provided in the App) and Workouts (the time of the workouts you do using the App) to your Health App (Apple Health Kit; Google Fit), the Health App will receive this information and update your measures.

7. HOW YOU CAN EXERCISE YOUR PRIVACY RIGHTS

You have the right to request access to the personal information we have collected about you for the purposes of reviewing, modifying, or requesting erasure of the information. If you would like to receive a copy of data we process, please send us a data access request.

In certain cases, you may also request that we restrict or cease processing your information.

If you would like to make a request to access, review, or correct the personal information we have collected about you, please contact us by emailing us at support@girl-power-club.com or through one of the methods in the "How to Contact Us" section below.

To help protect your privacy and security, we will take reasonable steps to verify your identity (such as requiring a password and user ID) before granting access to your information.

You will be notified of any actions taken on your personal information in response to a request submitted for modification, deletion, or restrictions on the processing of your personal information.

When data processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before such withdrawal. You also have a right to data portability when the data processing is based on a contract between you and the Company and the data was processed by automated means. To exercise any of the available to you privacy rights, please send a request to support@girl-power-club.com, the Company will respond to your request within 30 days.

8. HOW “DO NOT TRACK” REQUESTS ARE HANDLED

Except as otherwise stipulated in this Privacy Policy, our App does not support “Do Not Track” requests. To determine whether any of the third-party services it uses honor the “Do Not Track” requests, please read their privacy policies.

9. CHANGES TO THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time. If we decide to make material changes to this Privacy Policy, you will be notified through our Service or by other available means and will have an opportunity to review the revised Privacy Policy. By continuing to access or use the Service after those changes become effective, you agree to be bound by the revised Privacy Policy.

10. INTERNATIONAL DATA TRANSFERS

We may transfer personal data to countries other than the country in which the data was originally collected in order to provide the Service set forth in our Terms and Conditions of Use and for purposes indicated in this Privacy Policy. If these countries do not have the same data protection laws as the country in which you initially provided the information, we deploy special safeguards.

11. CALIFORNIA CONSUMER PRIVACY ACT (NOTICES AND RIGHTS FOR CALIFORNIA CONSUMERS)

This section applies only to consumers who reside in the State of California.

This section of our Privacy Policy supplements our Privacy Policy to provide additional information under the California Consumer Privacy Act of 2018, as amended, and other California consumer protection laws.

This section does not apply to Company’s personnel or to California residents, whose information we obtain in business, to business interactions.

11.1. NOTICE AT COLLECTION OF PERSONAL INFORMATION

The personal information we collect about consumers and the business or commercial purposes for which it will be used is described in these sections of our Privacy Policy:

Please find below the summary of the categories and specific pieces of information the Company may have obtained about you during the past twelve (12) months, depending on the nature and scope of our interactions with you:

11.1.1. PERSONAL IDENTIFIERS

- Name, postal address, email address, and telephone number if provided by the customer or available from public or commercial sources.
- Gender, weight, height, activity level, fitness and nutrition goals, submitted by the customer.
- Username and password for our Website or/and App.
- Internet protocol address; mobile device identifier.

11.1.2. INTERNET ACTIVITY

- Forms completed online; browsing history; search history.
- Interactions with the advertisements, the Website and the App.
- Posts from Facebook, Instagram and other social media on our Sites or tagged with our corporate accounts.
- E-mail communications.

11.1.3. COMMERCIAL INFORMATION

- Transaction history with the Company and affiliates for products and services purchased.
- Credit reports if providing financing for purchase through a payment processor not usually retained by the Company.

11.1.4. CONSUMER INFORMATION

Credit/debit card information, if provided, to complete a transaction through a payment processor, usually not retained by the Company.

11.1.5. GEOLOCATION DATA

- General location information may be derived from IP addresses and mobile device data.
- Precise geolocation is collected with your consent in order to provide certain products and services you request.

11.1.6. CUSTOMER OR HOUSEHOLD PROFILE INFORMATION

- Profile of customer interests, preferences and needs.
- Customer's geographic location.
- Customer's budget.
- Customer's family composition and age ranges.

11.1.7. BIOMETRIC INFORMATION

- Videos, if provided.
- Photos, if provided.
- Recordings of voicemails.
- Recordings of customer service calls.

11.2. RIGHT TO KNOW ABOUT PERSONAL INFORMATION WE COLLECT, DISCLOSE, OR SELL

California consumers have the right to request any of the following information regarding personal information collected by the Company about the consumer or the consumer's household during the last twelve (12) months ("Right to Know"):

- The categories of personal information we collected.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting or selling personal information.
- For personal information sold or exchanged for value with a third party: categories of personal information and categories of third parties.
- For personal information disclosed to a third party for a business purpose: categories of personal information; and categories (of) third parties.
- The specific pieces of personal information collected about you (except for very sensitive personally identifiable information, which we will describe, but not transmit).

The process by which we verify and respond to your requests is explained below under "How to Make a Verifiable California Consumer Request" and "How We Will Respond to a California Consumer Request." You may submit a Right to Know request at support@girl-power-club.com.

11.3. YOUR RIGHT TO DELETION OF PERSONAL INFORMATION

California consumers have the right to request that a business delete any personal information about the consumer, which a business has collected from the consumer, subject to a range of exclusions permitted by law ("Right to Delete").

For example, a business is not required to delete personal information if it is necessary to complete a transaction, is reasonably used for an ongoing business relationship, or is used internally in a lawful manner that is compatible with the context in which the consumer provided the information.

Once we receive and verify your request, we will separately confirm your request and follow appropriate procedures to verify the identity and authority of the person submitting the request. If the Right to Delete request is confirmed and verified, we will delete (and direct our service providers to delete) the requested personal information from our records, unless an exclusion applies. If we are unable to fulfill all or part of your request, we will let you know why (for example, if we have a permitted reason to retain certain information if the identity of the requesting person cannot be verified).

The process by which we verify and respond to your requests is explained below under "How to Make a Verifiable California Consumer Request" and "How We Will Respond to a California Consumer Request." You may submit a Right to Delete request at support@girl-power-club.com.

11.4. NO SALES OF PERSONAL INFORMATION

California consumers have the right to direct a business not to sell their personal information to others. In the preceding twelve months, the Company has not made sales of personal information for monetary or other consideration and has no present plans to do so. We share personal information with third parties for the purposes described in the section of this Privacy Policy titled "WITH WHOM WE SHARE YOUR PERSONAL DATA".

11.5. DESIGNATING AN AUTHORIZED AGENT

California consumers have the right to designate an authorized agent to act on their behalf to submit a Right to Know or Right to Delete request, or (if applicable) a request to opt-out from the sale of their Personal Information. An authorized agent may be a natural person, or a business entity registered with the Secretary of State. An authorized agent must also submit to the Company a written proof of their authorization to act on the consumer's behalf.

11.6. HOW TO MAKE A VERIFIABLE CALIFORNIA CONSUMER REQUEST

California consumers may submit a request to exercise any of their rights described above, as noted under the "Contact Us" section.

11.7. HOW WE WILL RESPOND TO A CALIFORNIA CONSUMER REQUEST

We will confirm receipt of your Right to Know or Right to Delete request within ten (10) days and may request additional information necessary to verify that you are permitted to make the request.

We will respond to any verifiable consumer request within forty-five (45) days of receiving it, subject to delays and exclusions permitted by law. If we require more time to respond, we will let you know the reason why and the extension period in writing. If you have a password-protected online account with us, we will respond via that account. If you do not have an online account, we will use the email address or U.S. Postal address you provided to us when making the request. For a Right to Know request, our response will cover the twelve (12) month period preceding our receipt of the request. If we cannot comply with all or part of your request, we will explain the reasons why. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information readily from one entity to another entity.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

11.8. PROTECTION FROM DISCRIMINATION FOR EXERCISING CALIFORNIA CONSUMER RIGHTS

California consumers have a right not to receive discriminatory treatment by the business for exercising the privacy rights conferred by the California Consumer Privacy Act. As such, we will not discriminate against a California consumer for exercising any of the rights described in this section. This means that except as legally permitted we will not:

- Provide you a different level or quality of goods or services.
- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

11.9. FINANCIAL INCENTIVE PROGRAMS

We are permitted to offer certain financial or service incentives to encourage consumers to provide certain financial information. If we offer a financial or service benefit program to you, we will provide a written description of the material terms of the program to you in a written Notice of Financial Incentive, and you will only be enrolled as a participant if you affirmatively opt-in to the program. You may revoke your opt-in consent at any time. The Notice of Financial Incentive will explain the process for opting-in to participate and withdrawing from the program (opting-out) in.

11.10. CALIFORNIA "SHINE THE LIGHT" LAW

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third-parties' direct marketing purposes within the immediately preceding calendar year. We will provide you with a list of the categories of personal information disclosed and a list of the names and addresses of the third parties. To make such a request, please send an email including evidence of residency in California to support@girl-power-club.com.

12. PERSONAL DATA CONTROLLER

Bigly LLC, a company registered in Delaware, USA (with registered office at 611 South DuPont Highway Suite 102, Dover, Delaware, United States, 19901) will be the controller of your personal data.

13. CONTACT US

You may contact us at any time for details regarding this Privacy Policy and its previous versions.

For any questions concerning your account or your personal data please contact us at support@girl-power-club.com.