

Privacy Policy

Last Updated: May 31, 2019

This Privacy Policy describes how information about you is collected, used and disclosed by Project Strong Group, Inc. d/b/a MyStrongCircle ("MSC" or "we," "us" or "our") when you access or use any MSC website, mobile application or content provided by us (collectively, the "Site") or otherwise interact with us. If you do not agree to this Privacy Policy, do not use the Site or give us any of your information.

Updates to our Privacy Policy

MSC reserves the right to change or modify this Privacy Policy at any time and in our sole discretion. If we make changes to this Privacy Policy, we will provide notice of such changes, such as by sending an email notification, providing notice through the Site or updating the "Last Updated" date at the beginning of this Privacy Policy. We encourage you to review this Privacy Policy whenever you use or access the Site or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy.

Minors

The Site is not intended for or directed to persons under the age of 13, and we will not knowingly collect information from such persons. Any person who provides information to us through registration or in any other manner on the Site represents to MSC that they are 13 years of age or older. If we learn that a child under 13 has submitted personal information to us, we will attempt to delete the information as soon as possible.

Collection of Information

We collect information that you provide us, from third parties, and automatically when you use our Site. We collect information associated with your device using cookies and similar technologies. We may also receive information about your location.

Personally Identifiable Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you register for a MSC account, sign up for a membership, participate in any interactive features of the Site, participate in a survey or promotion, communicate with us via third party social media sites, request customer support or otherwise communicate with us.

The types of information we may collect from you include:

- (a) **Account and Profile Information**, such as your name, email address, password, phone number, membership plan, selected fitness clubs and studios;
- (b) **Transaction Information**, such as billing address and credit card information when you purchase a membership plan or incur other fees such as cancellation or late fees.
- (c) **Other Information You Choose to Provide**, such as when you participate in a survey, promotion or interactive area of the Site or when you request technical or customer support.

Information We Collect from Other Sources

We may obtain information about you from other sources and combine that with information we collect directly. For example, we may collect information about you when you post content to feeds on third-party social media sites, or if you use credentials (e.g., username and password) from a third-party site to create or log into your MSC account. Additionally, we may receive information about you from our

partners. For example, our payment processors may update your payment information, advertising partners may help us send communications to your email address, and third parties may help us prevent fraud by verifying your contact information.

Information We Collect Automatically

When you access or use the Site, the types of information we may automatically collect about you include:

(a) **Log Information:** When you visit the Site, our servers automatically record certain log file information, such as your Internet Protocol (“IP”) address, operating system, browser type and language, referring URLs, access times, pages viewed, links clicked and other information about your activities on the Site.

(b) **Mobile Device and Location Information:** We collect information about the mobile device you use to access or use the Site, including the hardware model, operating system and version, unique device identifiers, mobile network information and information about your use of our mobile applications. With your consent, we may also collect information about the location of your device. For more information about how you can control the collection of location information, please see “Your Choices” below.

(c) **Information Collected by Cookies and Other Tracking Technologies:** We and our service providers use various tracking technologies, including cookies and web beacons, to collect information about you when you interact with our Site, including information about your browsing and purchasing behavior. Cookies are small data files stored on your hard drive or in device memory that help us improve the Site and your experience, see which areas and features of the Site are popular, and count visits. Web beacons are electronic images that may be used in the Site or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see “Your Choices” below.

Use of Information

We may use Personally Identifiable information about you for various purposes, including to:

- (a) provide you with the Site and our offerings;
- (b) manage your account and send you related information, including confirmations, security alerts and support and administrative messages;
- (c) respond to your comments, questions and requests and provide customer service;
- (d) communicate with you about the Site, services, offers, surveys, events and other news and information we think may be of interest to you;
- (e) contact you for feedback about our services;
- (f) conduct research about MSC’s customer base or services;
- (g) facilitate account creation and fulfill reservation and purchase requests at your selected fitness clubs and studios (collectively, “Participating Clubs”);
- (h) process your payments (and to be clear, only our payment processing partner(s) receive credit card information);
- (i) notify you of technical updates or changes in policy;
- (j) facilitate promotions;

(k) detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of MSC and others; and

(l) link or combine with information we get from others to help understand your needs and provide you with a better experience.

We may use non-Personally Identifiable Information such as demographic data to analyze and develop our marketing strategy and maintain and further improve the Site and our services.

Sharing of Information

We do not rent or sell your Personally Identifiable Information (such as your email address associated with your account) to third parties to use for their own marketing purposes. We may share Personally Identifiable Information about you as follows or as otherwise described in this Privacy Policy:

(a) to any Participating Clubs that you select as part of your membership plan and their third-party providers, so they can make available services to you and send you other communication that may be of interest such as special offers (you may opt-out of marketing communications directly with the applicable Participating Club);

(b) if sharing the information is reasonably necessary to provide or otherwise make available the Site and any feature of the Site or a service;

(c) to keep you up to date on special offers, updates, or other information we think you would like to hear about either from us or from our business partners (unless you have opted out of these types of communications). (Note that you will not be able to opt-out of service announcements that contain important information relevant to your use of the Site and are not promotional in nature.);

(d) in connection with a sale or merger with another entity, consolidation, restructuring, sale of company assets, financing or other corporate change or if MSC should ever file for bankruptcy;

(e) to your employer, if you participate in any enterprise solutions or corporate programs;

(f) when we otherwise have your consent or directive to share the information;

(g) if we believe your actions are inconsistent with our Terms of Use or other policies, or to protect the rights, property or safety of MSC or others; or

(h) if we believe in good faith that we are required to do so by law, in connection with litigation, to prevent a crime, or to protect personal property, the public, or the Site.

We may also share non-Personally Identifiable Information with third parties (e.g. aggregate or demographic data), which cannot reasonably be used to identify you.

Third Party Plug-ins, Widgets, and Links

Our Site may include third-party social media features and other third-party plug-ins and widgets. When these features are displayed on our Site, they are operated or hosted by third parties and are subject to their own privacy policies instead of this Privacy Policy. Our Site also contains links to third-party sites, including those of the Participating Clubs, that are not controlled or operated by us. Please be aware that we are not responsible for the privacy practices of such other sites.

Advertising and Analytics Services Provided by Others

We may allow others to serve advertisements on our behalf across the Internet and to provide analytics services. These entities may use cookies, web beacons and other technologies to collect information about your use of the Site and other websites, including your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Sites and other websites and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices.

Other Websites and Services

We are not responsible for the practices employed by any websites and/or services linked to and/or from our Site, including without limitation the content contained therein. Please remember that when you use a link to go from our Site to another website, our Privacy Policy does not apply to those third-party websites and/or services. Your browsing and interaction on any third-party website, including those that have a link on our Site, are subject to such third party's own rules and policies. In addition, you agree that we are not responsible and do not have control over any third-parties that you authorize to access your personal information. If you are using a third-party website and/or service and you allow them to access your personal information, you do so at your own risk.

Security

MSC takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases, nor can we guarantee that the information you supply will not be intercepted while being transmitted to or from us over the Internet.

Data Transfers

Please be aware that the Site and our services are subject to United States laws, including those governing privacy and security of your information. We may host and process data, including your personal information in the United States and in other countries through third parties that we use to operate and/or manage the Site. By using our Site, you represent that you are a legal resident of the U.S., and you agree and consent (and represent that you have the authority to provide such consent) to the information collection, use and sharing practices described in this Privacy Policy.

Your Choices

Account Information

You may update, correct or modify information about you at any time by logging into your online account or by emailing us at members@mystrongcircle.com. If you wish to deactivate your account, please email us at members@mystrongcircle.com, but note we may continue to store information about you as required by law or for legitimate business purposes.

Location Information

With your consent, we may collect information about your actual location when you use our mobile applications. You may stop the collection of this information at any time by changing the settings on your mobile device, but note that some features of our mobile applications may no longer function if you do so.

Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Site.

Promotional Communications

You may opt out of receiving promotional communications from us by following the instructions in those communications or by emailing us at members@mystrongcircle.com. If you opt out, we may still send you non-promotional communications, such as those about your account or our ongoing business relations.

Push Notifications

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device or within our mobile applications.

Your California Privacy Rights

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a California resident, you may request this information once per calendar year by writing to us at Project Strong Group, Inc., Attn: California Privacy Rights, P.O. Box 300082, Chicago, Illinois 60630-0882.

Contact Us

If you have any questions about this Privacy Policy, please contact us at members@mystrongcircle.com.