

Privacy Policy

Circadn Technologies, Inc., doing business as CoachFirst (“we”, “us” or “our”) are committed to protecting and the privacy of all visitors to our website www.coachfirst.com (and all pages attaching to and including this domain name) and all visitors who access our website or services through any mobile application (together, the “Site”).

This Privacy Statement (together with our terms of use and any other documents referred to in it) sets out the basis on which we process and collect personal data from:

1. Businesses or individuals who subscribe to our service (e.g., coaches, gyms and gym staff) (referred to throughout as “Subscribers”); and
2. The individuals who purchase products and services from the Subscribers (e.g., gym members) (referred to throughout as “Subscriber’s Customers”), (both Subscribers and Subscriber’s Customers are referred to as “you” or “yours”, as appropriate).

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. All capitalized terms that are

used but not otherwise defined in this Privacy Statement have the definitions assigned to them in the Terms of Use.

Subscribers Customers

If you are a Subscriber's Customer and use our Site in connection with services offered by the Subscriber, we collect information relating to you on behalf of the Subscriber. The information you give us may include your name, mailing address, e-mail address, phone number and payment information. In these circumstances, we act as a data processor and the Subscriber (e.g., your gym) acts as a data controller.

If you are a Subscriber's Customer, we only share your personal data with the individual or entity you have purchased services from, and do not share your personal data with other companies aside from the ones disclosed in this policy who act as sub-processors to us. Your personal data will be stored and held by us as described herein. You should contact

the Subscriber with any questions, complaints or requests regarding the processing of your personal data.

We encourage you to refer to the Subscriber's Privacy Statement in order to understand how your personal data is collected and used.

Subscribers

If you are a Subscriber or an agent or employee of a Subscriber, we act as a data controller of the personal data that we collect about you.

1 Information we may collect

1.1 Information you give us. You may give us information about you by filling in forms on our Site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our Site, subscribe to a service available via the Site and / or when you report a problem with our Site. The information you give us may include

your name, postal address, e-mail address, phone number and payment information. With your permission, we may also access other personal information on your device, such as your phone book, calendar or messages, in order to provide services to you.

1.2 Information we may collect about you. With regard to each of your visits to our Site we may automatically collect the following information:

1. technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, unique personal identifiers (including device identifier, cookies, beacons, pixel tags, mobile ad identifiers and similar technology), your search terms, and the website you visited before you visited our Site or used our Services; and
2. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time), products and / or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

1.3 Information we receive from other sources. If authorized by you, we may access profile and other information from services like Facebook.

As part of our services, we permit Subscribers to accept payments from the Subscriber's Customers through integration with Stripe's Connect Platform, and may receive information about you through your use of this platform. Your use of Stripe's platform will be subject to Stripe's terms and conditions and privacy policy. We also work closely with third parties (including, for example, business partners, sub-contractors in technical services, analytics providers and search information providers) and may receive information about you from them that is relevant to our business.

1.4 Children under 13. We do not knowingly contact or collect personal information from children under 13. If you believe we have inadvertently collected such information, please contact us so we can promptly obtain parental consent or remove the information.

2. Uses made of the information

2.1 Lawful basis of processing. Our processing of your personal data is necessary for the most part in order to perform the services that you have requested of us. We may also, from time to time, process your data in order to further our own legitimate interests, as set out in more detail below. Where we process your personal data in order to further our own legitimate interests, we will ensure that your data protection rights are respected at all times. You have a right to object to our use of your personal data where it is based on our legitimate interests, and if you do so, we will cease to use and process your personal data for that purpose, unless we can show there are compelling legitimate reasons for us to

continue or we need to use the Personal Data for the purposes of legal claims.

2.2 Where you agree to certain uses: We may use the information you provide, and the information we collect, where you have consented to our use for a particular purpose, such as to allow us to make suggestions and recommendations to you about goods or services that may interest you.

2.3 If you do give your consent for us to use your personal data for a particular purpose, you have the right at any time to withdraw your consent to our future use of your personal data for some or all of those purposes by writing to admin@coachfirst.com.

2.4 Information you give to us. We will use this information:

1. to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
2. to improve our Site to ensure that content is presented in the most effective manner for you and for your device.

3. to allow you to participate in interactive features of our Site when you choose to do so;
4. as part of our efforts to keep our Site safe and secure.

2.5 Information we collect about you.We will use this information:

1. to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
2. to improve our Site to ensure that content is presented in the most effective manner for you;
3. to allow you to participate in interactive features of our Site when you choose to do so;
4. as part of our efforts to keep our Site safe and secure.

2.6 Information we receive from other sources.We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

3. Disclosure of your information.

3.1 We do not allow advertising companies to collect data through our service for ad targeting.

3.2 We take reasonable steps to secure your personal data against unauthorized access or disclosure. The transmission of data is encrypted in all circumstances where you provide payment information.

3.3 We may share your personal data with our parents, affiliates and subsidiaries.

3.4 We may share your information with selected third parties including our business partners, product and services suppliers and subcontractors; and / or analytics and search engine providers that assist us in the improvement of our Site.

3.5 We may also disclose your personal information to third parties:

1. if we are acquired or we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
2. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, to comply with the rules of any stock exchange or other trading exchange to which we are subject, in order to enforce or apply this Privacy Statement, our terms of use Terms of Use or other agreements; and / or
3. to protect our (or our customers or other relevant parties') rights, property or safety.

4. Where we store your personal data

4.1 Personal data that we collect from you may be transferred to, stored and processed at, any country where we or our suppliers, service providers or sub-contractors do business. Regardless of where your data is stored, we will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Statement.

4.2 Where you have chosen (or where we have given you) a password which enables you to access certain parts of our Site, you are responsible

for keeping the password confidential. We ask you not to share your password with anyone.

4.3 Please be aware that the transmission of information via the Internet is not completely secure. Although we will do our best to protect your data, we cannot guarantee the security of your data transmitted to our Site which you transmit at your own risk. Once we have received your information, we will apply procedures and use security features to try to prevent unauthorised access.

5. Retention of your personal data

5.1 We retain your personal data for as long as is necessary for the purpose for which it was collected, or as required or permitted for legal and regulatory purposes and legitimate business purposes.

5.2 If you decide to delete your account we will promptly remove your personal data from our system (such as your name, mailing address, e-mail address and phone number) and other preferences associated with your account. However, we may retain copies of your personal data as explained above.

6. Your rights

6.1 If you are an agent or an employee of the Subscriber (e.g., gym staff or employees) and we act as the data controller of your personal data, you

can contact us about questions, complaints or requests regarding our processing of your personal data at support@coachfirst.com.

6.2 You have the right to request a copy of your personal data currently held by your data controller. Where we act as your data controller, we will provide you with a copy of your personal data as soon as practicable (subject to applicable data protection laws). We may also request proof of identification to verify your access request.

6.3 You may also have the right to correct, block or erase your personal data in certain circumstances. You can sign into your account to see, change and / or delete any personal data that we hold, such as your name, postal address, e-mail address and phone number.

6.4 We will not be required to erase your personal data from our records where to do so would prevent us from meeting our contractual obligations, or where we are required to process (including retaining) your personal data in order to comply with a legal obligation, or if the personal data may

be necessary to establish, exercise or defend our legal rights or for the purpose of legal proceedings.

6.5 Subject to applicable data protection laws, you may have the right to receive your personal data, which you have provided to a data controller, in a machine-readable format and / or where technically possible, to have that personal data sent to another data controller.

6.6 If you choose to receive a newsletter or other information from us, you can unsubscribe at any time. You will be given the opportunity to unsubscribe in each notification or you can exercise the right by contacting us at support@coachfirst.com.

7. Linked websites

7.1 Our Site may, from time to time, contain links to and from other websites. If you follow a link to any of those websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for those websites or policies. Please check the applicable policies before you submit any personal data to those websites.

8. Changes to this Privacy

Statement

8.1 We may from time to time revise this Privacy Statement by amending this page. You will be bound by such revised terms current when you use the Site and you should therefore periodically check this page for any amendments we make. If we make any material changes to our policies, we will place a prominent notice on our website or application. If the

change materially affects registered users, we will send a notice to you by email, push notification or text.

9. Rights of California

Residents

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under the age of 18, reside in California, and have a registered account with the Site, you have the right to request removal of unwanted data that you

publicly post on the Site. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Site, but please be aware that the data may not be completely or comprehensively removed from our systems.

Explanation of Individual Rights

Right to a Copy/Access or Portability: You may have the right to request, free of charge, a copy of the specific pieces of Personal Data that we have collected about you in a readily useable format that allows you to transmit this information to another entity without hindrance.

Right to Know: You may have the right to request, free of charge, that we provide certain information about how we have handled your Personal Data, including the categories of Personal Data collected; categories of sources of Personal Information; business and/or commercial purposes for collecting your Personal Data; categories of third parties/with whom we have shared your Personal Data; and whether we sell any categories of Personal Data to third parties.

Right to Deletion: You may have the right to request deletion of your Personal Data that we have collected, subject to certain exemptions. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase or promotion). We may also retain residual information, such as records to document that your request has been fulfilled.

Right to Non-Discrimination: You may have the right not to receive discriminatory treatment on the basis of exercising your privacy rights under applicable law.

Right to Correct/Rectify: You may have the right to rectify any incorrect Personal Data we may hold about you.

Right to Object/Restrict: You may have the right to object to a specific use of your Personal Data as it is laid out in this Privacy Statement subject to our legitimate business interests.

10. Contact

We are based at 3506 Community Drive, Jupiter, FL, USA 33458.

Where applicable law allows for such a right, if you would like to request to access, correct, object to the use, restrict or delete Personal Data that you have previously provided to us, or if you would like to request to receive

an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may submit a request with the subject line "Data Subject Request" to admin@coachfirst.com

All other questions, comments and requests regarding this Privacy Statement are welcomed and should be addressed to admin@coachfirst.com.

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