

PRIVACY POLICY

LAST UPDATED: Sunday, April 14, 2024

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1 INTRODUCTION

Welcome to Holistic Experiment LLC, we are a company based in Houston, Texas, United States of America. We focus on helping you track and manage your health and fitness through our ThinkFit mobile app and websites (hereinafter referred to as "ThinkFit", "we", "us", "our") and the services provided through the website <https://ThinkFit.app/>, our software, APIs, or otherwise and mobile website and mobile applications related, linked, or otherwise connected thereto (collectively the "Platform"). For the sake of convenience, the term "ThinkFit Store", "Store", "ThinkFit Academy" shall be collectively included in the term "Platform", wherever used unless specified otherwise in writing. ThinkFit is a mobile and web-based tool that enables you to better manage your health and wellbeing. Data protection is a particularly high priority for ThinkFit. The use of the Platform of ThinkFit is possible without any indication of personal data; however, if a data subject wants to use special services via our Platform, processing of personal data may become necessary. If the processing of personal data is necessary, and there is no statutory basis for such processing, we generally obtain consent from the data subject. In this policy, "ThinkFit" refers to the products and services provided by the Holistic experiment LLC and its Affiliates, which shall mean subsidiaries, parent companies, joint ventures and other corporate entities under common ownership and under the name of "ThinkFit."

The processing of personal data, such as the name, address, email address, or telephone number of a data subject shall always be in line with the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA) and in accordance with the country-specific data protection regulations applicable to ThinkFit. Utilizing this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed through this data protection declaration of the rights to which they are entitled.

As the controller, ThinkFit has implemented numerous technical and organizational measures to ensure the complete protection of personal data processed through this Platform. However, Internet-based data transmissions may, in principle, have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g., by telephone.

2 DEFINITIONS

The data protection declaration of ThinkFit is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection declaration should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used. In this data protection declaration, we use, among other things, the following terms:

A) Personal data

Personal data means any information relating to an identified or identifiable natural person ("data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

B) Data subject

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

C) Processing

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by

transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

D) Restriction of processing

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

E) Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

F) Pseudonymization

Pseudonymization is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

G) Controller or controller responsible for the processing

Controller or controller responsible for the processing is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

H) Processor

Processor is a natural or legal person, public authority, agency, or other body which processes personal data on behalf of the controller.

I) Recipient

Recipient is a natural or legal person, public authority, agency, or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

J) Third-party

Third-party is a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

K) Affiliate

Means any program offered under the Service by another Third Party or Partner.

L) Device

Means any device that can access the Service such as a computer, a cellphone, or a digital tablet.

M) Program

Means the software program provided by us and downloaded by you on any electronic Device.

N) ThinkFit Store" (also referred to as "Store")

Refers to our website accessible from <https://store.thinkfit.app/>.

O) "Third-party Social Media Service

Means any services or content (including data, information, products, or services) provided by a third-party that may be displayed, included, or made available by the Platform or Programs we provide.

P) "ThinkFit Academy" (also referred to as "Academy")

Refers to Our website accessible from <https://academy.thinkfit.app/> or alternative as provided on the official website/platform.

Q) Consent

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

3 SCOPE

This privacy policy covers:

- 3.1 visitors to our Platform such as you; and
registered users of the Platform such as you, as the case may be.

As a visitor to, or registered user of, the Platform, You may provide Your personal information to us to obtain our services from our Platform.

4 NAME AND ADDRESS OF THE CONTROLLER

Controller for the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

Holistic experiment LLC

1321 Upland Dr.

#5572

Houston, TX 77043

hello@thinkfit.app

5 COLLECTION OF GENERAL DATA AND INFORMATION

The Platform of ThinkFit collects a series of general data and information when a data subject or automated system calls up the Platform. This general data and information are stored in the server log files. The general data collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our Platform (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Platform, (6) an Internet

protocol address (IP address), (7) the Internet service provider of the accessing system, (8) Payment method details such as credit card details (9) phone numbers and, (10) any other similar data and information that may be used in the event of attacks on our information technology systems.

We may also collect the following kinds of information when you, your colleagues, agents, representatives, or other users, access the Platform:

- i. Your contact information, such as your first and last name
- ii. your profile picture or its URL
- iii. your user ID number, which is linked to publicly available information such as name, profile photo, groups you belong to, events you are attending, challenges you are participating in and actions you choose to share.
- iv. the login e-mail you provided at the time you registered
- v. your physical location and that of your access devices
- vi. your gender
- vii. your birthdate
- viii. your wellness objectives
- ix. information about type of employment, working hours
- x. fitness levels
- xi. details about environment (i.e. availability of space for exercise, equipment etc).

You represent and warrant that you have sought the consent of any individual whose information you provide to us.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

We may collect personal information about you from the information You provide to us when you fill out an application or other forms on our

Platform, a Program, over the phone or in person. We may also receive, and also share, personal information about you, from and with third-party services such as Third-party Social Media Services and others. Lastly, we may also collect personal information from individuals whose identity you share with us as described in this policy.

Our servers also collect information from you, such as your domain name, websites you visit, and Internet Protocol address. This information is not personally identifiable. However, when you respond to questions or communicate with us, your personal information may be collected.

If you use ThinkFit Services on your mobile telephone or other mobile device, including iPads and tablets, we collect your mobile device identifier and IP Address. In certain Services we will create and assign to your device an identifier that is similar to an account number. We may collect the name you have associated with your device, device type, country, and any other information you choose to provide, such as username, character name or e-mail address.

If a third party is not paying for the service on your behalf, we will collect the billing and financial information necessary to process your charges for ThinkFit Platform services which require payment, which may include your postal and e-mail addresses. ThinkFit may also receive the billing and payment information that you provide when your purchase is processed by another party, such as Paypal. Our Terms of Service explain our policies and terms relevant to our charges and billing practices. Please note that establishing an account with a third party payment processor, like Paypal, may also be subject to additional policies.

To the extent that you are accessing the Platform while domiciled outside of the United States, you acknowledge that the Personal Information you are providing us is collected and stored in the United States and therefore consent to the transfer of information to and storage of the information outside of your domiciled country and in the United States.

We may collect and process your personal data for statistical purposes, including the creation of aggregate data sets. This data analysis is essential to enhance your experience on the Platform by providing a more customized and personalized approach. It enables us to tailor the content, features, and recommendations to suit your preferences and needs, ultimately striving to improve your overall user experience and contribute to your general wellness, wellbeing, energy, and productivity.

Additionally, this aggregated data may be utilized to target offers related to products and/or services that align with our mission of enhancing user experience and promoting user wellness, wellbeing, energy, and productivity. Rest assured that all data used for these purposes will be handled in accordance with applicable data protection laws and regulations, including the General Data Protection Regulation (GDPR), and will not be used in a manner that could identify you personally without your explicit consent.

Your privacy and data security are of paramount importance to us, and we are committed to ensuring that your personal data is processed responsibly and ethically. For more information on how your data is used and your rights regarding your personal information, please refer to our full Privacy Policy.

By continuing to use the Platform, you consent to the collection and processing of your personal data for the purposes outlined above. If you have any questions or concerns regarding the handling of your data, please don't hesitate to contact us using the contact information provided in this Privacy Policy.

6 USE OF INFORMATION

Where it is in our legitimate interest to do so, We may use your personal information:

- i. to create your user accounts and allow you to use our Platform
- ii. to suggest connections with other ThinkFit users

- iii. to enable user-to-user communications
- iv. to prevent fraud or potentially illegal activities, and enforce our Terms of Service
- v. to deliver and target resources
- vi. To provide you with details about our products and services by email, text, phone and through other communication methods;
- vii. to develop and improve our services and products;
- viii. to update our records;
- ix. to carry out checks required by applicable regulation or regulatory guidance;
- x. to improve Our relationship with You by making the Website available to You in a User-friendly way, and to identify the products and services which You may be interested in;
- xi. for customer service, including answering questions and responding to Feedback and complaints;
- xii. for any other specific purposes in relation to Your activities via the Site or in any form of communication or access to our Services;
- xiii. Where you have given us consent, we shall provide you with information about any new products, services, events, promotions, and other information which we think will be of interest to you. You can withdraw your consent at any time, but without affecting the lawfulness of processing based on consent before its withdrawal and with a reasonable time thereafter for systems to get updated. You can update your details or change your privacy preferences by contacting us via the details given in the "Contact Us" section. You have the option to unsubscribe from these emails by following the unsubscribe link provided in our newsletters. However, it's essential to understand that if you choose to unsubscribe, you may miss important information and cease to receive all communications from us.

6.1 We use your email address to communicate with you. Upon your consent, we may direct electronic email communication to you about our services or market new services. We may also ask to seek your feedback on the services we offer. You have an option to opt-out of such electronic communication. Lastly, we may track your email activity to check the effectiveness of the communication.

By unsubscribing from our newsletters and/or opting out of such electronic communication mentioned in Section 6.1, you acknowledge and accept that:

6.1.1 You may miss out on critical updates, notifications, and announcements related to our services.

6.1.2 We will no longer send any emails, including newsletters and important service-related communications, to the email address associated with your account.

6.1.3 We will have no obligation to send you any future communications, and you will be responsible for staying informed about any changes or updates to our services through other means available within the application.

When using these general data and information, ThinkFit does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our Platform correctly, (2) optimize the content of our Platform as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, (4) for analytics purposes, (5) to facilitate account creation and logon process, (6) request feedback (7) as necessary for basic functionality of the Platform and account management (billing our clients) and, (8) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, ThinkFit analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise and to

achieve an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

7 SHARING PERSONAL INFORMATION

7.1 We may provide your personal information to other companies for:

7.1.1 Their general marketing purposes, upon receiving your consent.

7.1.2 To perform services on our behalf, including payment processing, data analysis, e-mail delivery, hosting services, customer service and to assist us in our marketing efforts.

However, we may aggregate anonymized information based on your personal information and disclose this to advertisers and other third parties. Besides, we direct all such third-party service providers to maintain the confidentiality of the information disclosed to them and to not use your information for any purpose other than to provide services on ThinkFit's behalf.

7.2 We may disclose your personal information to third parties where it is in our legitimate interest to do so, including the following reasons:

7.2.1 we may share your information with analytics and search engine providers that assist us in the improvement and optimization of our Platform;

7.2.2 we may disclose your personal information on request to the police or any other regulator or government authority to fulfill our regulatory responsibilities, to help prevent or detect fraud or any other type of crime, or for any other reasonable purpose;

7.2.3 Save as set out in this privacy policy; we will not sell or disclose your data to any third party;

7.2.4 We may share your information in the event of a merger, acquisition, or sale of our assets. We shall communicate with you in the event of such a change. We may assign your contract to another party, and you agree that

we can provide them with your information, for such purposes and you would be notified of any such assignment.

7.2.5 Some of the third parties who may require your information belong to territories or countries other than the United States. The third-parties are subjected to all relevant laws in their jurisdictions pertaining to the information we share with them.

8 CONTACT POSSIBILITY VIA THE PLATFORM

The Platform of ThinkFit contains information that enables a quick electronic contact to our enterprise, as well as direct communication with us, which also includes a general address of the so-called electronic mail (email address). If a data subject contacts the controller by email or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

9 CCPA PROVISIO

The California Code of Regulations defines a "resident" as:

- 9.1 every individual who is in the State of California for other than a temporary or transitory purpose and
- 9.2 every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, certain rights and obligations apply regarding your personal information.

if you are a resident of California, you are granted specific rights regarding access to your personal information.

Your California Privacy Rights

If you are a California resident, you have the following rights specifically under the California Consumer Privacy Act:

Right to Know. You have the right to know and see what data we have collected about you over the past 12 months, including:

- (1) The categories of personal information we have collected about you;
- (2) The categories of sources from which the personal information is collected;
- (3) The business or commercial purpose for collecting your personal information;
- (4) The categories of third parties with whom we have shared your personal information; and
- (5) The specific pieces of personal information we have collected about you.

Right to Delete. You have the right to request that we delete the personal information we have collected from you (and direct our service providers to do the same).

If you are under 18 years of age, reside in California, and have a registered account with the Platform, you have the right to request removal of unwanted data that you publicly post on the Platform. 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 Platform, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

Other Rights. California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our 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 in this document.

Certain information may be exempt from such requests under applicable law. For example, we need certain types of information so that we can provide the Platform to you. If you ask us to delete it, you may no longer be able to access or use the Platform.

To exercise your rights under the California Consumer Privacy Act, please contact us by either sending us an e-mail at hello@thinkfit.app. Please provide your full name and e-mail address so that we may respond to your request as quickly as possible. You may be required to verify your identify before we fulfill your request. To do so, you will need to provide us with certain account information, such as your full name and email address. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization for the agent to act on your behalf. You will still need to verify your identity directly with us.

10 SECURITY

This Platform ensures that data is encrypted when leaving the Platform. This process involves the converting of information or data into a code to prevent unauthorised access. This Platform follows this process and employs secure methods to ensure the protection of all credit and debit card transactions. Encryption methods such as SSL are utilised to protect customer data when in transit to and from this Platform over a secure communications channel.

Whilst we do everything within our power to ensure that personal data is protected at all times from our Platform, we cannot guarantee the security and integrity of the information that has been transmitted to our Platform.

11 ROUTINE ERASURE AND BLOCKING OF PERSONAL DATA

The data controller shall process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

12 RIGHTS OF THE DATA SUBJECT

A) Right of confirmation

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed. If a data subject wishes to avail himself of this right of confirmation, he or she may, at any time, contact us or another employee of the controller.

B) Right of access

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. Furthermore, the European directives and regulations grant the data subject access to the following information: the purposes of the processing; the categories of personal data concerned; the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of personal data, or restriction of processing of personal data concerning the data subject, or to object to such processing; the existence of the right to file a complaint

with a supervisory authority; where the personal data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

Furthermore, the data subject shall have a right to obtain information as to whether personal data are transferred to a third country or an international organization. Where this is the case, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer.

If a data subject wishes to avail himself of this right of access, he or she may at any time contact our us or another employee of the controller.

C) Right to rectification

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact us or another employee of the controller.

D) Right to erasure (Right to be forgotten)

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies, as long as the processing is not necessary:

The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.

The data subject withdraws consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing.

The data subject objects to the processing in accordance with Article 21(1) of the GDPR, and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR.

The personal data have been unlawfully processed.

The personal data must be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The personal data have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If one of the aforementioned reasons applies, and a data subject wishes to request the erasure of personal data stored by ThinkFit, he or she may at any time contact our us or another employee of the controller. ThinkFit or another employee shall promptly ensure that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17(1) to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. ThinkFit or another employee will arrange the necessary measures in individual cases.

E) Right of restriction of processing

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one of the following applies:

The accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.

The processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.

The controller no longer needs the personal data for the processing, but they are required by the data subject for the establishment, exercise or Defense of legal claims.

The data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

If one of the conditions mentioned above is met, and a data subject wishes to request the restriction of the processing of personal data stored by ThinkFit, he or she may at any time contact us or another employee of the controller. ThinkFit or another employee will arrange the restriction of the processing.

F) Right to data portability

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used, and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided. As long as the processing is based on consent pursuant to point (a) of Article 6(1) of the GDPR or point (a) of Article 9(2) of the GDPR, or on a contract pursuant to point (b) of Article 6(1) of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20(1) of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where

technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact ThinkFit or another employee.

G) Right to object

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

ThinkFit shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or Defense of legal claims.

If ThinkFit processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to ThinkFit to the processing for direct marketing purposes, ThinkFit will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by ThinkFit for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may directly contact ThinkFit or another employee. In addition, the data subject is free in the context of the use of information society services, and

notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

H) Automated individual decision-making, including profiling

Each data subject shall have the right granted by the European legislator not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her, or similarly significantly affects him or her, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) is not authorized by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, or (3) is not based on the data subject's explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between the data subject and a data controller, or (2) it is based on the data subject's explicit consent, ThinkFit shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on the part of the controller, to express his or her point of view and contest the decision.

If the data subject wishes to exercise the rights concerning automated individual decision-making, he or she may at any time directly contact ThinkFit or another employee of the controller.

I) Right to withdraw data protection consent

Each data subject shall have the right granted by the European legislator to withdraw his or her consent to the processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may at any time directly contact ThinkFit or another employee of the controller.

13 DATA PROTECTION PROVISIONS ABOUT THE APPLICATION AND USE OF GOOGLE ANALYTICS (WITH ANONYMIZATION FUNCTION) AND YOUTUBE

On this Platform, the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics, the controller uses the application “_gat. _anonymizeIp”. By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymized when accessing our Platform from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyse the traffic on our Platform. Google uses the collected data and information, among other things, to evaluate the use of our Platform and to provide online reports, which show the activities on our Platform, and to provide other services concerning the use of our Platform for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyse the use of our Platform. With each call-up to one of the individual pages of this Platform, which is operated by the controller and into which a Google Analytics component

was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our Platform by the data subject. With each visit to our Platform, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our Platform at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this Platform, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript that any data and information

about the visits of Platform may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

The controller has integrated components of YouTube in the Platform. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them.

Further information about YouTube may be obtained at <https://www.youtube.com/yt/about/en/>.

YouTube and Google will receive information through the YouTube component that the data subject has visited our Platform if the data subject at the time of the call to our Platform is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If the transmission of this information to YouTube and Google is not desired by the user, it can be prevented by logging out of their YouTube account before accessing our Platform.

YouTube's data protection provisions, available at <https://www.google.com/intl/en/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

14 PAYMENT METHOD: DATA PROTECTION PROVISIONS ABOUT THE USE OF PAYPAL AS A PAYMENT PROCESSOR

On this Platform, the controller has integrated components of PayPal. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which represent virtual private or business accounts. PayPal is also able to process virtual payments through credit cards when a user does not have a PayPal account. A PayPal account is managed via an email address, which is why there are no classic account numbers. PayPal makes it possible to trigger online payments to third parties or to receive payments. PayPal also accepts trustee functions and offers buyer protection services.

The European operating company of PayPal is PayPal (Europe) S.à.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg.

If the data subject chooses "PayPal" as the payment option in the online shop during the ordering process, we automatically transmit the data of the data subject to PayPal accordingly. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing.

The personal data transmitted to PayPal is usually first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data, which are in connection with the respective order.

The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to PayPal, in particular, if a legitimate interest in the transmission is given. The personal data exchanged between PayPal and the controller for the processing of the data will be transmitted by PayPal to economic credit agencies. This transmission is intended for identity and creditworthiness checks.

PayPal will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfil contractual obligations or for data to be processed in the order.

The data subject has the possibility to revoke consent for the handling of personal data at any time from PayPal. A revocation shall not have any effect on personal data which must be processed, used, or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of PayPal may be retrieved under <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

15 DATA PROTECTION PROVISIONS ABOUT THE APPLICATION AND USE OF SENDGRID

The mail provider service "Sendgrid" by SendGrid, Inc., 1801 California St Suite 500, Denver, CO 80202, USA, receives and processes on our behalf the data necessary for the order, in particular email address, IP address, and device name. These data are processed on servers in the USA. Sendgrid is certified according to "privacy shield". The "privacy shield" is an agreement between the European Union (EU) and the USA to ensure compliance with European data protection standards in the USA.

Sendgrid is a service with which the dispatch of newsletters can be organized and analyzed. With the help of Sendgrid we can analyze our newsletter campaigns. When you open an e-mail sent with Sendgrid, a file contained in the e-mail (so-called web beacon) connects to the Sendgrid servers in the USA. This allows you to determine whether a newsletter message has been opened, when the last email was sent and opened and which links have been clicked on. In addition, technical information is recorded (e.g., time of registration, IP address, browser type, and operating system). They are used exclusively for statistical analysis of newsletter campaigns. The results of these analyses can be used to better adapt future newsletters to the interests of the recipients.

If you do not want Sendgrid to analyze your data, you must unsubscribe from the newsletter. For this purpose, we provide a respective link in every newsletter.

Details on Sendgrid and its Privacy Policy can be found here: <https://sendgrid.com/policies/privacy/services-privacy-policy/>.

The data stored for the purpose of newsletter subscription will be stored by us until you unsubscribe from the newsletter and will be deleted from our servers as well as from the servers of Sendgrid after you unsubscribe from the newsletter. Data stored by us for other purposes (e.g., email address for the use of the Platform) remain unaffected.

OPT-OUT: The user can withdraw the consent to the storage of data, the email address, and their respective use for sending the newsletter at any time. This can be done free of charge (except for the transmission costs) and via a link in the newsletter itself or notification to us or, if applicable, to Sendgrid.

16 DATA PROTECTION PROVISIONS ABOUT THE APPLICATION AND USE OF THE SERVICE PROVIDER SELFY

The Platform uses Sellfy to sell digital products. This company is based in the Republic of Lithuania. Personal data shall be collected in accordance with the requirements of the legal acts of the European Union, the Republic of Lithuania and the instructions of the controlling authorities. <https://sellfy.com/privacy/>.

17 LEGAL BASIS FOR THE PROCESSING

Art. 6(1) lit. a GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose. If the processing of personal data is necessary for the performance of a contract to which the data subject is party, as is the case, for example, when processing operations are necessary for the supply of goods or to provide any other service, the processing is based on Article 6(1) lit. b GDPR. The same applies to such processing operations which are necessary for carrying out

pre-contractual measures, for example, in the case of inquiries concerning our services. If we are subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1) lit. c GDPR. In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or another natural person. Then the processing would be based on Art. 6(1) lit. d GDPR. Finally, processing operations could be based on Article 6(1) lit. f GDPR. This legal basis is used for processing operations which are not covered by any of the abovementioned legal grounds, if the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if the data subject is a client of the controller (Recital 47 Sentence 2 GDPR).

18 CHILDREN'S COPPA COMPLIANCE

Our Platform does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children, we take steps to remove that information from our servers.

19 THE LEGITIMATE INTERESTS PURSUED BY THE CONTROLLER OR BY A THIRD PARTY

Where the processing of personal data is based on Article 6(1) lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

20 PERIOD FOR WHICH THE PERSONAL DATA WILL BE STORED

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or the initiation of a contract. If the data subject requests for termination or terminates his ThinkFit Account, the personal data shall be retained for a period of 1 year from date of termination.

21 PROVISION OF PERSONAL DATA AS STATUTORY OR CONTRACTUAL REQUIREMENT; REQUIREMENT NECESSARY TO ENTER INTO A CONTRACT; OBLIGATION OF THE DATA SUBJECT TO PROVIDE THE PERSONAL DATA; POSSIBLE CONSEQUENCES OF FAILURE TO PROVIDE SUCH DATA

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when we sign a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact us. We will clarify to the data subject whether the provision of the personal data is required by law, contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

22 CONTACT US

If You have any questions about the provisions in this Privacy Policy, please send an e-mail to hello@thinkfit.app or use the contact us button on the

Platform. All other inquiries should be directed to ThinkFit's Feedback Page or hello@thinkfit.app.