BEZZ TRAINING CLUB PRIVACY POLICY

Bezz Training Club ("us", "we", "our", the "Company", "Bezz Training Club" or "Bezz") has created this privacy policy ("Privacy Policy") to give you confidence as you visit and use our services online and offline, and to demonstrate our commitment to fair information practices and the protection of privacy.

This Privacy Policy is only applicable to information we obtain in the course of our business, including though our website, our mobile app, Bezz Training Clubs, our social media accounts, communications with Bezz Training Club, and other online and offline offerings (collectively, the "Services"). This Privacy Policy does not apply to any third-party products, services or websites that you may be able to access via the Services, which may have data collection, storage, and use practices and policies that differ materially from this Privacy Policy. This Privacy Policy supplements and forms a part of the Bezz Training Club Terms and Conditions (the "T&Cs"). Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in the T&Cs.

By using our Services, you agree to the collection and use of information in accordance with this Privacy Policy.

- 1. Types of Information Collected
- 1.1 "Personal Information" is information that personally identifies you. When you register for a Bezz Training Club membership, visit Bezz Training Club Clubs, use our Services, contact us directly, or interact with us on social media, you may provide us with certain Personal Information including your name, date of birth, gender, e-mail address, social media handles, phone number, and your physical address. For more information on how we use and share your Sensitive Personal Information, please see Section 3.2 ("On-Site Business Partners") below.
- 1.2 "Account Information" is information that we collect in connection with your Bezz Training Club membership account. The types of Account Information we collect may include the type of membership, billing method, effective dates of your membership, username and password ("Membership Information), and information in connection with the use of our Services, such as records of the products and services purchased, personal preferences such as favorite programs and classes, and notations made to your account in connection with a customer service communications between you to Bezz Training Club.
- 1.3 "Financial Information" is information we collect to process payments from you, such as a credit card number and/or other related information that may be required from you to complete your purchase. We do not store or retain any of your Financial Information, except for the last four digits of your credit card. For more information on how your Financial Information is used and shared in these instances, please see Section 3.3 ("Payment Processors") below.

- 1.4 "Traffic Data" is information that your browser sends whenever you visit or use the Website or the App, as well as any other generic user information through the use of commonly-used information-gathering tools, such as cookies and web beacons. Traffic Data may also include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the type of mobile phone you are using to access our Services, the operating software and firmware used by your mobile phone, the pages of the Platform that you visit, the time and date of your visit, the time spent on those pages and other data generated from cookies (see Section 4 Cookies below for more information).
- 2. Legal Basis, Use and Retention of Information

2.1 Use of Information Collected

We may process your Personal Information for the purposes identified in this Privacy Policy, pursuant to the following legal basis: (1) with your consent, (2) for compliance with a legal obligation to which Bezz Training Club is subject, (3) for the performance of a contract to which you are party, (4) in order to protect your vital interests, or (5) when we have assessed it is necessary for the purposes of the legitimate interests pursued by Bezz Training Club or a third party to whom it may be necessary to disclose information and are not overridden by your rights and freedoms, including your right to have your personal data protected.

We use your Personal Information for our legitimate business interest in operating and improving our business and services, including to: provide our services, products, and other offerings to you; establish, manage and administer your membership and account with us; personalize and improve your membership experience; respond to requests and enquiries from you or a third party; optimize our website and customer experience; provide customer support; inform you about our products and services; and ensure that our operations are conducted in an appropriate and efficient manner.

We may also use your Personal Information to perform analytics with your consent (including market research, trend analysis, and financial analysis).

We may also use your Personal Information to protect against and prevent safety and security issues, fraud and other criminal activity, claims and other liabilities, and to comply with and enforce applicable legal requirements, relevant industry standards, and our policies and terms.

We may also use your Personal Information to send important notices, such as communications about your membership and changes to our policies. Because this information is important to your interaction with Bezz Training Club, you may not opt out of receiving these communications.

We collect Account Information for the purpose of providing and improving the Services, responding to your requests/inquiries, servicing your account, and communicating about your membership account.

We collect Financial Information for the purpose of processing payment for products or services purchased.

We collect Traffic Data for the purpose of providing and improving the Services, and, as described in this Privacy Policy, to, with your consent, advertise to you.

We may link or combine the personally identifiable information we collect and/or receive about you with non-personally identifiable information we collect or receive about you, such as the Traffic Data we collect automatically during your visit to our website or use of certain of our Services. This allows us to

provide you with a personalized experience and helps us to continually work to improve our Services. If we do combine non-personally identifiable information with personally identifiable information, the combined information will be treated as personally identifiable information for as long as it remains combined.

2.2 Retention Policy

We will only retain your personally identifiable data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of our legitimate business interests that have been accessed and satisfy any legal or reporting requirements. For clarity, we retain all information collected for so long as you have a membership account with us, so that we can service your membership efficiently. Should you request to deactivate your membership account or for us to erase your personally identifiable data, subject to our 30-day retention period for back-ups, we will cease to retain all personally identifiable information you have provided. However, retention periods may be extended if we are required to preserve your information or data because of litigation, investigations and other similar proceedings, or if a longer retention period is required or permitted by applicable law.

3. Third Party Data Processors and Service Providers

We do not sell, otherwise disclose, or share data we collect about you except as described in this Privacy Policy. We may share your personal data with third parties as described below:

3.1 Business Affiliates

We may share your data with our affiliates, subsidiaries and parent companies ("Affiliates"), for the purpose of any necessary collaboration. In addition, if Bezz Training Club is involved in a merger, acquisition or asset sale, your Personal Information and data may be transferred as a business asset. In such cases, we will provide notice before your Personal Information is transferred and/or becomes subject to a different Privacy Policy.

3.2 On-Site Business Partners

For your convenience, Bezz Training Club Clubs may contain products or services provided by third party operators, including fitness equipment and fitness trainers. Third party operators operate independently from us, and the privacy practices of the relevant third parties, including details on the information they may collect about you, are subject to the privacy policies of those third-parties, which we strongly encourage you to review, as their practices may differ from ours.

3.3 Payment Processors

When you make a payment for the Services, we process your payments via a third-party payment processor. In these instances, the third-party payment processor may collect certain Financial Information from you to process a payment on behalf of Bezz Training Club, including your name, email address, address and other billing information in which case the use and storage of your Financial Information is governed by the third party payment processor's terms, conditions and privacy policies.

3.4 Vendors

Bezz Training Club engages certain third parties that may process data submitted to Bezz Training Club to perform certain business-related functions and to increase the functionality of our Services. Third party

companies provide various other services to us, such as monitoring and analyzing how our Services are used or performing. When we engage another company to perform such functions, we may provide them with information, including Personal Information, Account Information and Traffic Data in connection with their performance of such functions. These third parties may analyze the data we provide, combine that data with publicly available data, and provide us with access to their analysis and reports.

We do not display the identities of all of our third-party data processors and service providers publicly by name for security and competitive reasons. If you would like further information about the identities of our third-party data processors and service providers, please contact us as provided in Section 13 Contact Us below.

To the extent these third parties have access to any of your data, and especially your Personal Information or a combination of data that is deemed to be personally identifiable, please know that they are contractually (i) limited to only use this data to perform specific tasks on our behalf and (ii) obligated not to disclose or use your information for any other purpose.

4. Cookies

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and transferred to your device. We use cookies to collect information in order to improve our services for you. The third parties we work with may also use cookies to help us analyze how our users are using the Service.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provide information on how to accept cookies, disable cookies or to notify you when receiving a new cookie.

If you do not accept cookies, you may not be able to use some features of our Service and we recommend that you leave them turned on.

We use the following types of cookies (collectively, "Cookie Data"):

"Essential Cookies" are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. Because of their essential nature, you cannot opt out of these cookies.

"Functional Cookies" enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages.

"Analytics Cookies" allow us to count visits and traffic sources, so we can measure and improve the performance of our site. They help us know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous.

Additionally, "Advertising Cookies" may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites.

5. Opting Out of Promotional Communications

You may opt out of receiving promotional communications from us by contacting us as provided in Section 13 Contact Us below, or following the unsubscribe link or instructions provided in any email we send.

6. Compliance with Laws

We will disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Service.

7. Children's Privacy

Our Services are not directed at anyone under the age of thirteen (13); and we do not knowingly collect personally identifiable information from anyone under the age of thirteen (13). Additionally, you must be over the minimum age to consent to the processing of your personal data as required by the laws of your country to use our Services.

8. Data Transfer

To facilitate Bezz Training Club's future global operations, we may store, transfer and access the information and personally identifiable information you submit to our Services around the world, including the United States, Canada and other countries in which Bezz Training Club or its third party service providers have operations. This Privacy Policy shall apply even if Bezz Training Club transfers such information or personally identifiable information to other countries. By consenting to this Privacy Policy and using our Services (or, for the avoidance of any doubt, providing information or personally identifiable information to us on any Company website in any other context), you consent to the transfer of your information and personally identifiable information among these facilities, including those located outside your home country.

You may request a copy of the safeguards that we have put in place in respect of any applicable transfers of personally identifiable information by contacting us as described in the Contact Us section below.

For the avoidance of any doubt, if you are located outside United States and choose to provide information to us, please note that our current practice is to transfer the information, including Personal Information, to United States, where it is processed. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

9. Security

The security of your Personal Information is important to us, and we strive to implement and maintain administrative, technical, and physical security measures appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the internet, or method of electronic storage is 100% secure and we are unable to guarantee the absolute security of the Personal Information we have collected from you.

10. Changes To This Privacy Policy

This Privacy Policy is effective as of May 1, 2023, and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

11. Contact Us

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