

## PRIVACY POLICY

Last Updated: February 13, 2025



### INTRODUCTION

FINDTIME. ("our" "we" or "us") respect the privacy and are committed to protect the personal information of our Users ("user," "you," "your" or "yours") when you visit or use FINDTIME. (the "App"). We provide our App and Services (hereinafter collectively, either "App" or "Services") to you as under the following privacy policy (the "Policy").

### PERSONAL INFORMATION WE COLLECT

In order to keep the App functional, we must process information about you to operate, improve, modify, customize, support and market our services. If you do not agree with this, then you can update/delete your personal information: **in app**

The type of information that we collect depends on how you use our App and Services. We require certain information to deliver to you, our services, and without this, we will not be able to provide such services to you. Our Services have optional features, which, if used by you, require us to collect additional information to provide such features. You will be notified of such collection, as appropriate. If you choose not to provide the information needed to use a feature, you will be unable to use the feature. Please carefully read the following to understand what information we may collect:

- When you use the App or register to the App, we may ask you to provide certain information, including **Email, Name, Surname, Phone, Username, Password, Address, Contact preferences, Billing addresses, Debit/credit card numbers or Personal number.** We will also collect or otherwise ask you to provide additional information that you

provide us, such as your profile details, pictures and/or any other texts, images, videos or information that you may upload on the App and/or provide to the App.

- Your financial information when you make purchases on the App. We collect financial information when you make a purchase on the Stripe, Google Play In-App Payments, Apple Store In-App Payments or other payment providers.
- Geo-Location Data. We may use and store information about your location, if you give us permission to do so. If you are accessing a page or service from a computer or a mobile device, you may be asked to share your precise (GPS level) geo-location information with us so we can customize your experience on our services or on other services when we work with a marketing partner such as a third party service provider, advertiser, advertising network and platform, advertising agency, and a data broker or aggregator. If you agree to the collection of location data, in most cases, you will be able to turn off such data collection at any time by accessing the privacy settings of your mobile device
- We may also collect details about other social networks and linked accounts such as Facebook, Instagram, Google and also information about your communications with us as well as communication with other users of our App, and we receive certain information, which they provide, such as **To create user accounts, To manage user orders, To contact user, To protect your site, prevent fraud, To improving services, marketing, To comply with applicable laws, To provide support, To inform about services/promotions or To post testimonials.**
- We also collect information while you access, browse, view or otherwise use the App. In other words, when you access the App we are aware of your usage of the App, and gather, collect and record the information relating to such usage, including geo-location information, IP address, device and connection information, browser information and web-log information, phone book and contacts, and all communications recorded by Users through the App. We use that information to enhance user experience, personalize your browsing experience as well as monitor the App for preventing fraud and inappropriate content or behavior. We collect texts, information, pictures, videos and/or any data that you may upload on the app. We also collect supplemental information obtained from third parties such as demographic and navigation data, if applicable. We combine your personal information with information we collect automatically or obtain from other companies and use it to improve and personalize our services, content and advertising and/or to prevent fraud.

All of the preceding is collected, as permitted by applicable laws relevant to your jurisdiction.

## **HOW DO WE COLLECT PERSONAL INFORMATION?**

**Information provided by you.** You directly provide us with most of the information we collect. You do this by filling out the registration details on the App, linking accounts of other social networks to your FINDTIME account, completing application forms, as well as by posting and sharing additional information voluntarily.

**Information we collect when you use the App.** We collect technical information indirectly and automatically through our systems. This information includes logging your operating system, software configuration, Internet Protocol (IP) address and use of cookies (cookies are small files sent from us to your computer and sometimes back). Cookies ultimately help us improve your navigation and ease of use of our App.

Should you require additional information about how we may use Cookies to improve the services we provide, please visit our **Cookie Policy**.

**Information we collect from other sources.** We may receive information from third party vendors and/or other commercially available sources, such as:

- Third party vendors who provide us data to supplement the information we collect about you, in accordance with applicable laws. For example, we receive information from advertising and marketing partners in order to manage and measure our campaigns as well as from enrichment service providers to enhance, modify and personalize your experience of the App.
- If you link, connect, or login to your to your social media accounts with us, with a third-party service (e.g. Facebook, Instagram, Google), we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on such social media platform. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

- For more information, please see the following sections of this Policy: **Analytics, Cookies and Marketing and Behavioral Remarketing**

## **HOW WE USE COLLECTED PERSONAL INFORMATION?**

All processing of your personal information will always be justified by a "lawful ground" for processing, where relevant under applicable laws. In the majority of cases, processing will be justified on the basis that:

- you, or in the case you are below the age of 16 or the age of legal adulthood if different in your country, your parent or guardian has provided consent for us to use your personal information for a specific purpose;
- the use of your personal information is necessary to perform a contract or take reasonable steps to enter into a contract with you **(e.g. to provide you with agreements or services which you have purchased)**;
- the processing is necessary to comply with a relevant legal obligation or regulatory obligation that you and/or we have (e.g. fraud prevention); or
- the processing is necessary to support our legitimate interests as a business (e.g. to improve our services to you), subject to your interests and fundamental rights and provided it is conducted at all times in a way that is proportionate.

We will use your personal information for the following purposes:

- To create user accounts.
- To manage user orders.
- To contact user.
- We use information we have to verify accounts and activity; combat harmful conduct, protect users against bad experiences and spam; and promote safety, security and integrity on and off our Services, such as by investigating suspicious activity or violations of our Terms and policies, and to ensure our Services are being used legally. Safety, security and integrity are an integral part of our Services.
- Our processing of your personal information for marketing purposes is based on our legitimate interest, or on your consent, or as otherwise permitted according to applicable laws. You have a right to prevent direct marketing of any form at any time - this can be exercised by following the opt-out link attached to each communication or by sending an email to [info@fitlesstime.com](mailto:info@fitlesstime.com).

- We take steps to limit direct marketing to a reasonable and proportionate level, and to send you communications which we believe may be of interest or relevance to you, based on the information we have about you.
- To comply with applicable laws.
- To provide support.
- We use your personal information to inform you about our products, services or promotions from FINDTIME, that may be of interest to you or our related services. This may be via email, post, SMS, telephone or targeted online advertisements.
- To post testimonials.

## **HOW LONG DO WE RETAIN YOUR PERSONAL INFORMATION?**

We retain personal information only for as long as is required to fulfil the purpose for which it was collected and unless otherwise stated for a period of: **as long as the user has an account with us**. Please note that some circumstances, we will retain your personal information for longer periods of time. We will retain personal information for the following purposes:

- as long as it is necessary and relevant for our operations, e.g. as long as is necessary to provide services, etc.; and
- in relation to personal information to comply with applicable laws, prevent fraud, troubleshoot problems, assist with any investigation, enforce our App terms and take other actions as permitted by law.

## **CHILDREN UNDER THE LEGAL AGE OF ADULTHOOD**

Users declare themselves to be adult according to their applicable legislation. Children, 13 or 16 years of age, depending on your jurisdiction and applicable laws, may use this App only with the assistance and prior consent of a parent or guardian. Under no circumstance, a child may use this Application without prior parent or guardian consent. No child should provide any personal information to or on the App without prior consent of their parent or guardian. Parents and guardians should at all times supervise their children's activities.

We notify and obtain consent from parents before collecting any data from children. We do not knowingly collect any information from children under 13 prior to obtaining consent from the parent.

When obtaining consent from a parent or guardian, we ask a series of knowledge based questions that a child would otherwise be unable to answer.

Should we learn we have collected or received personal information from a child under 13 or 16 without prior consent from their parent or guardian, we will delete that personal information immediately. If you believe we might have any information from or about a child under 13 or 16, without the consent of the child's guardian, please contact us at [info@fitlesstime.com](mailto:info@fitlesstime.com).

Your Rights as a Parent or Guardian:

- You may request to review your child's personal information, direct us to delete it, and/or refuse to allow any further collection or use of the child's information, e.g by contacting us by email ([info@fitlesstime.com](mailto:info@fitlesstime.com)) or in any other way convenient for you
- You may simply agree to the collection and use of your child's information, but refuse disclosure to third parties unless that's part of the service; and

To exercise any of your aforesaid rights as a parent or guardian of a child, please contact us at:

- [info@fitlesstime.com](mailto:info@fitlesstime.com)

Should you have any questions or queries regarding this section of the Policy, please contact us at:

- [info@fitlesstime.com](mailto:info@fitlesstime.com)

## **SHARING PERSONAL INFORMATION WITH THIRD PARTIES**

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent.

We share your personal information with third parties as under:

- We share personal information with service providers that provide us with services for the purpose of operating the App and opening and operating your account. Consistent with applicable legal requirements, we take commercially reasonable steps to require third parties to adequately safeguard your personal information and only process it in accordance with our instructions;

- We share personal information to law enforcement agencies, public authorities or other parties, if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with our legal obligations;
- We share personal information with payment processors, fraud detection agencies and similar third parties for the purpose of facilitating payments done via the App and securing the App and protecting it against fraud or other liabilities;
- We also may share limited personal information with such social media platforms and marketing partners, such as Facebook, Twitter and Google, to promote our services. Such features and third party services collect certain information about you and may set a cookie to enable their functionality. Such third party features are governed by their privacy policies and under their terms and conditions.
- Personal information will also be disclosed if we go through a business transition such as a merger, sale, transfer of all or a portion of FINDTIME. 's assets, acquisition, bankruptcy or similar event. In the event that we sell any business or assets, we will disclose your data to the prospective buyer. If we or substantially all of our assets are acquired by a third party, information held by us about our users will be one of the transferred assets.

Please note, when you publish your information and/or share your data with other Users, we try to maintain the standards of all users, but we do not take responsibility over the actions of other users.

## **WHERE WE STORE YOUR PERSONAL INFORMATION**

We may store your data manually or electronically. Any data stored electronically will be stored in secure servers, and any data stored manually will be stored in our premises within the **United Kingdom**. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted to us and any transmission is at your own risk.

## **COOKIES**

We use cookies and similar technologies (such as web beacons, pixels, tags, and scripts) to improve and personalize your experience, provide our services, analyze performance and for marketing purposes.

Some of the services we use such as **Google Analytics**, **Firebase** set cookies to allow us to gather anonymous data about your usage of our website.

A cookie is a text file sent by a web server to a web browser and stored in the browser. The file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may send a cookie which may be stored by your browser on your computer's hard drive. The information we obtain from the cookie could be used to improve the website's usability and for marketing purposes. We may also use that information to recognize your computer when you use our App and to personalize our App for you.

Browsers usually will allow you to refuse cookies but this could have a negative impact on the usability of many websites.

To learn more about how we and our third party service providers use cookies and your control over these Cookies, please see our Cookie Policy.

## **DO NOT TRACK**

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by the web and online services. We do not honor browser requests not to be tracked online (known as "Do Not Track"), but our Cookie Policy describes how you can opt out of receiving cookies. To learn more about cookies, including how to view which cookies have been set and how to manage and delete them, please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org). At this time, our App do not respond to Do Not Track beacons sent by browser plugins.

## **Analytics:**

We use **Google Analytics**, **Firebase** to collect the following information when users access or interact with our App: This information may include, among other information, the browser and operating system you are using, the URL or advertisement that referred you to our Website, the search terms you entered into a search engine that led you to our Website, areas within our Website that you visited, and other information commonly shared when browsers communicate with websites. This information may also include x/y coordinates of mouse events, unique ID tracking cookie, Internet Protocol ("IP") address (anonymized for residents of the European

Economic Area), unique device identifier ("Device Identifier") for any device (computer, mobile phone, tablet, etc.). A Device Identifier is a number that is automatically assigned or connected to the device you use to access the Service, and our servers identify your device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the device used to access the Service.

We use the information from **Google Analytics, Firebase** in order to assemble statistics regarding usage of our App as well as to help us understand how users engage with our App on an individual and aggregate basis in order to improve it; to help with customer service needs (such as troubleshooting issues that users report to us); and for research and analytical purposes such as service performance; customer behavior and common navigation through the App.

We do not share our App traffic data with any third party for any purpose unless required for legal reasons such as meeting applicable laws, regulations, legal processes, or enforceable governmental requests and/or unless you have given an explicit consent to allow us to do so; enforcing applicable terms of service; detecting, preventing, or otherwise addressing fraud, security, or technical issues; protecting against harm to the rights, property or safety of our Company, our Customers, or the public as required or permitted by law.

If you'd like to opt-out or If you'd like to obtain a copy of your data, make a correction, or have it erased, please contact us in any way convenient for you in the **Contact Us** section.

## **MARKETING AND BEHAVIORAL REMARKETING**

We use marketing and remarketing services to advertise to you, or on third party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service. To learn more about cookies, including how to view which cookies have been set and how to manage and delete them, please visit: [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **GOOGLE ADS**

We may use Google AdSense Advertising on our App. Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of

the use of the DART cookie by visiting the Google Ad and Content Network privacy policy. You may view their advertising and privacy policies at the following links:

- <https://policies.google.com/technologies/ads>
- <https://policies.google.com/privacy>

## **FACEBOOK**

Facebook remarketing service is provided by Facebook Inc.

You can learn more about interest-based advertising from Facebook by visiting this page:

[https://www.facebook.com/adpreferences/ad\\_settings](https://www.facebook.com/adpreferences/ad_settings)

To opt-out from Facebook's interest-based ads follow these instructions from Facebook:

<https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA

<https://www.aboutads.info/choices>, the Digital Advertising Alliance of Canada in Canada

<https://youradchoices.ca> or the European Interactive Digital Advertising Alliance in Europe

<https://www.youronlinechoices.eu>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy:

<https://www.facebook.com/privacy/explanation>

## **TWITTER**

Twitter remarketing service is provided by Twitter Inc.

You can opt-out from Twitter's interest-based ads by following their instructions:

<https://support.twitter.com/articles/20170405>

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

The full list of marketing and remarketing services that we use can be found below:

- [Google Ads](#)
- [Facebook](#)
- [Twitter](#)
- [Instagram](#)
- [Mailchimp](#)

## **DISCLAIMERS:**

### **Ads and External Links**

Please note that the App may contains links to third party Apps and advertisements, and if you link to a third party App from the App, any data you provide to that App and any use of that data by the third party are not under the control of [FINDTIME](#). and are not subject to this Policy. You should consult the privacy policies of each App you visit. This Policy applies solely to personal information collected by our App. If you upload content, including personal information, to a social network and then tag the App, your submission will be subject to that social network's terms of use and privacy policy, even where you post on an official [FINDTIME](#) page on the social network. We do not have control over these terms of use and privacy policies and have not reviewed their adequacy. You should therefore review these before submitting any personal information.

### **Health, Medical, Fitness and Nutritional Content**

If the App offers medical, fitness and nutritional information and content, you should not rely on this information as a substitute for, nor does it replace, professional advice, diagnosis or treatment. Should you have any concerns, or questions about your health, fitness or nutrition, you should always consult with a physician, an expert, a health care, fitness or nutrition professional.

Not under any circumstance, should you avoid, delay or otherwise disregard seeking or obtaining professional advice because of something you may have read or seen on the App.

Please note that the App only may offers medical, fitness and nutritional information and content as a free journalistic-blogging content and does not constitute a medical help provider

whatsoever nor it solicits the use and/or purchase of medical devices or pharmaceutical product, unless they are of "free sale" category and do not require any special license or authorization.

Unless explicitly stated and after a specific consent registration, we **do not collect health related data** of the users and if you want to contact us and/or post questions and comments on the App regarding health, medical, fitness and nutritional matters, **you are therefore requested to do so in a manner that does not reveal your personal information** (e.g. only post questions in a abstract fashion). We reserve ourselves the right to delete the contents that are not in compliance with such request.

## **Incorrect Contents**

We take reasonable steps to ensure the accuracy of the information provide on the App and on the external link in this policy listed. However, the information is provided "as is" without any warranty of guarantee of any kind. Under no circumstance should you rely on the accuracy of information given on the App.

We take no responsibility or liability for the accuracy, content, completeness, reliability or legality of the information and contents contained on this App.

## **Paid Reviews**

FINDTIME. may posts paid reviews and testimonials. We take steps to ensure some accuracy in the paid reviews, but under no circumstance to we take responsibility, accept liability, or ensure any accuracy in the reviews posted. You should, not in any case, rely on the reviews contained on the App.

## **SECURITY**

We maintain reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control, including only providing access to personal information to employees and authorized service providers who require such information for the purposes described in this Privacy Policy.

## **RIGHTS OF EU USERS**

Under applicable EU regulation, in short, you have the following rights in respect of your personal information:

- 1) The right to be informed;
- 2) The right of access;
- 3) The right to erasure;
- 4) The right to rectification;
- 5) The right to restrict processing;
- 6) The right to data portability;
- 7) The right to object, and
- 8) Rights in relation to automated decision making and profiling.

Under applicable EU regulation, in detail, you have the following rights in respect of your personal information:

- to obtain a copy of your personal information together with information about how and on what basis that personal information is processed;
- to rectify inaccurate personal information;
- to erase your personal information in limited circumstances where (a) you believe that it is no longer necessary for us to hold your personal information; (b) we are processing your personal information on the basis of legitimate interests and you object to such processing, and we cannot demonstrate an overriding legitimate ground for the processing; (c) where you have provided your personal information to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your personal information; and (d) where you believe the personal information we hold about you is being unlawfully processed by us;
- to restrict processing of your personal information where: (a) the accuracy of the personal information is contested; (b) the processing is unlawful but you object to the

erasure of the personal information; (c) we no longer require the personal information for the purposes for which it was collected, but it is required for the establishment, exercise or defense of a legal claim or (d) you have objected to us processing your personal information based on our legitimate interests and we are considering your objection;

- to object to decisions which are based solely on automated processing or profiling;
- where you have provided your personal information to us with your consent, to ask us for a copy of this data in a structured, machine-readable format and to ask us to share (port) this data to another data controller; or
- to obtain a copy of or access to safeguards under which your personal information is transferred outside of the EEA.

In addition to the above, you have the right to lodge a complaint with a supervisory authority for data protection.

We will ask you for additional data to confirm your identity and for security purposes, before disclosing data requested by you. We reserve the right to charge a fee where permitted by law. We will decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Additionally, as permitted by applicable laws, we will retain where necessary certain personal information for a limited period of time for record-keeping, accounting and fraud prevention purposes.

The owner and Data controller is **FINDTIME, Fitless Time Ltd** [info@fitlesstime.com](mailto:info@fitlesstime.com).

## **SPECIFIC PROVISIONS FOR CALIFORNIA RESIDENTS**

This section of the Policy applies to you, if you are a California resident.

We have collected the following categories of personal information from Users:

- Information that you chose to upload or otherwise provided by you which may include:  
(i) Identifiers and personal information, such as name, postal addresses, online identifiers, email addresses, and location.
- Information we collect when you use the App, including (i) Identifiers and personal information, such as online identifiers, internet protocol (IP) addresses, access device and

connection information such as browser type, version, and time zone setting and browser plug-in types and versions; (ii) commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies; (iii) Internet or other electronic network activity information, including, but not limited to log-in and log-out time, the duration of sessions, the content uploaded and downloaded, viewed web-pages or specific content on web-pages, activity measures; (iv) Location information, based on your IP address and GPS, (iv) phonebook based on your contact lists; (v) pictures based on your camera.

- Inferences drawn from any of the information identified above to create a profile about you.
- We obtain personal information listed above from third party sources, as detailed in this Policy.

We use the personal information that we collect or receive for the business purposes as described above under the Section titled "**How Do We Use the Information Collected?**".

We disclose personal information to third parties for business purposes as described above under the Section titled "Sharing Personal Information with Third Parties" in the Policy. In the preceding twelve (12) months, we have disclosed all the categories of personal information detailed above for business purposes.

As previously mentioned in this Policy, we do not sell (as such term is defined in the CCPA) personal information and will not sell it without providing Users with a right to opt out.

You are entitled to the following specific rights under the CCPA in relation to personal information related to you:

- You have a right to request that we will disclose certain information to you about our collection and use of personal information related to you over the past 12 months. After verifying your request, we will disclose to you: (i) the categories of personal information that we collect about you; (ii) the categories of sources from which the personal information is collected; (iii) the purposes for collecting, using, or selling that personal information; (iv) the categories of personal information that we disclosed for a business purpose or sold, and the categories of third parties to whom we disclosed or sold that particular category of personal information; (v) the specific pieces of personal information that we have collected about you; (vi) if we disclosed your personal

information for a business purpose, the categories of personal information we have disclosed; (vii) if we sold your personal information, the categories of personal information we have sold.

- You have a right to request that we delete personal information related to you that we collected from you under certain circumstances and exceptions.
- You also have a right not to be discriminated against for exercising your rights under the CCPA.

To make such requests, we kindly ask that you contact us at [info@fitlesstime.com](mailto:info@fitlesstime.com).

We will verify your request using the information associated with your account, including email address. Government identification may also be required.

A request for access can be made by you only twice within a 12-months period. Any disclosures that we provide will only cover the 12-months period preceding receipt of your request. We do not charge a fee to process or respond to your verifiable User request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will inform you of the reasons for such decision and provide you with a cost estimate before processing further your request.

## **UPDATING PERSONAL INFORMATION**

We take steps to ensure that the personal information we collect is accurate and up to date, and we provide you with the opportunity to update your information through your account profile settings. In the event that you believe your information is in any way incorrect or inaccurate, please let us know immediately. We will make sure we investigate the matter and correct any inaccuracies as quickly as possible where necessary or give you ways to update it quickly or to delete it - unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we will ask you to verify your identity before we can act on your request. If for any reason you have a problem with deleting your personal information, please contact us at [info@fitlesstime.com](mailto:info@fitlesstime.com) and we will make reasonable efforts to delete any such information pursuant to any applicable privacy laws.

You can review and change your personal information: **in app**

## **CONTACT US**

To exercise any of your rights in connection with your personal information, we kindly ask that you please contact us at [info@fitlesstime.com](mailto:info@fitlesstime.com).

If you have any questions (or comments) concerning this Policy, please email our team at [info@fitlesstime.com](mailto:info@fitlesstime.com), and we will make an effort to reply within a reasonable timeframe.

For the purposes of GDPR (Article 27), you may contact our EU representative and Data Protection Officer: **FINDTIME. Fitless Time Ltd** [info@fitlesstime.com](mailto:info@fitlesstime.com) .

## **CONTACT US**

For any questions or queries regarding this Privacy Policy, please feel free to contact us:

**[info@fitlesstime.com](mailto:info@fitlesstime.com)**