# Training For Teens (TFT) Privacy Policy

Privacy Policy describes how TFT collects, uses, and shares your personal data.

Updated Aug 4, 2021



Please take a moment to familiarize yourself with our privacy practices, accessible below, and contact us if you have any questions. Your California Privacy Disclosures Information Regarding Commercial Electronic Messages in Canada

#### What Is Personal Data at TFT?

At TFT, we believe strongly in fundamental privacy rights — and that those fundamental rights should not differ depending on where you live in the world. That's why we treat any data that relates to an identified or identifiable individual or that is linked or linkable to them by TFT as "personal data," no matter where the individual lives. This means that data that directly identifies you — such as your name

— is personal data, and also data that does not directly identify you, but that can reasonably be used to identify you
— such as your phone number— is personal data. Aggregated data is considered non-personal data for the purposes of this Privacy Policy.

This Privacy Policy covers how TFT manages personal data whether you interact with us on our website, through email, through apps, or in person (including by phone/live chat sessions via third party platform provider (ie: Facetime), by text, by email, in fitness centers). TFT may also link to third parties on our services or make third-party apps available for download in our website (i.e.: third party youtube video fitness content). TFT's Privacy Policy does not apply to how third parties define personal data or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with any third party.

#### Your Privacy Rights at TFT

At TFT, we respect your ability to know, access, correct, transfer, restrict the processing of, and delete your personal data. We have provided these rights to our global customer base and if you choose to exercise these privacy rights, you have the right not to be treated in a discriminatory way nor to receive a lesser degree of service from TFT. TFT does not sell your data including as "sale" is defined in Nevada and California.

#### To exercise your privacy rights and choices, visit the TFT Data and Privacy page at

privacy.trainingforteens.com . To help protect the security of your personal data, TFT requires a parent or guardian to register any participant under the age of 15 for this program. To do this, the parent or legal guardian must submit name and email address to TFT on our Website sign up page (<u>Let's Get Started! | Training for Teens</u>) and registration form will be emailed directly to parent for signup. If the Data and Privacy page is not available in your region, you can make privacy rights requests at trainingforteensgma@gmail.com

*If you live in California, and* if you cannot access TFT's Data and Privacy page, you or your authorized agent can make a request at trainingforteensgma@gmail.com

## Personal Data TFT Collects from You

At TFT, we strive to **collect only the personal data that we need**. The personal data TFT collects depends on how you interact with TFT.

When your parent or legal guardian signs you up for the program we collect, participant name, email, cell phone, height, weight, dietary preferences, and what type of accountability partner you are interested in meeting/using in the program to meet your personal fitness goals. Our TFT Accountability Buddies may connect with you in any of the following methods but not limited to: social media, live chat sessions, Facetime, Text, Email. We may collect a variety of information, including:

- Type of Fitness Routines You Like.
- Food Preferences.
- Fitness Goals Details you wish to share with your Buddy/Accountability partner
- Contact Information.
- Weekly Schedule Availability for Workout Routines
- Payment Informatio
- Transaction Information.
- Fraud Pr

• **Health Information Will Not Be Collected from peer-to-peer.** At TFT we believe that it is in the participant's best interest to ensure they consult with a Doctor or Nutritionist if they are concerned about program as it may relate to their personal health issues.

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• Other Information You Provide to Us Personally. Details such as content of your communications with TFT, including interactions with any one of our TFT Representatives and/or Accountability partners.

You are not required to provide the personal data that we have requested. However, if you choose not to do so, in many cases we will not be able to provide you with the best service or respond to requests you may have.

#### Personal Data TFT Receives from Other Sources

TFT may receive personal data about you from other **individuals**, from businesses or third parties acting **at your direction**, from our **partners** who work with us to provide our services and assist us in security and fraud prevention, and from other lawful sources.

• Individuals. TFT may collect data about you from other individuals — for example, if your Accountability Partner contacts TFT for any reason related to you (ie: questions about workout routines, lost contact details).

• At Your Direction. You may direct other individuals or third parties to share data with TFT. For example, you may direct your Nutritionist or Doctor to share data about you if you feel necessary (ie: allergies to certain foods)

#### **TFT's Use of Personal Data**

TFT uses personal data to power our services, to process your transactions, to communicate with you, for security and fraud prevention, and to comply with the law. We may also use personal data for other purposes with your consent.

**TFT uses your personal data only when we have a valid legal basis to do so.** Depending on the circumstance, TFT may rely on your consent or the fact that the processing is necessary to fulfill a contract with you, protect your vital interests or those of other persons, or to comply with law. We may also process your personal data where we believe it is in our or others' legitimate interests, taking into consideration your interests, rights, and expectations. If you have questions about the legal basis, you can contact the Data Protection Officer at trainingforteensgma@gmail.com

• **Power Our Services.** TFT collects personal data necessary to power our services, which may include personal data collected to personalize or improve our offerings, for internal purposes such as auditing or data analysis, or for troubleshooting. For example, if you would prefer to work with a Female accountability partner over a Male, if you prefer cardio workouts over Spin or kickboxing, we need this data in order to better service your workout preferences.

• **Process Your Transactions.** To process transactions, TFT must collect data such as your name, personal workout & dietary preferences, and contact information. When we match you up with an Accountability partner, contact information and all details provided to TFT will transfer to your accountability partner so they can best service you in a personalized way that will help you achieve your fitness goals.

• **Communicate with You.** To respond to communications, reach out to you about your transactions or account, market our products and services, provide other relevant information, or request information or feedback, from time to time, we may use your personal data to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with TFT you may not opt out of receiving these important notices.

• Security and Fraud Prevention. To protect individuals, employees, and TFT and for loss prevention and to prevent fraud for the benefit of all our users, and prescreening or scanning uploaded content for potentially illegal content, including child sexual exploitation material. If at any time a TFT user or Accountability Partner Representative feels harassed in any way whether it be:

- Discriminatory Harassment.
- Personal Harassment. ...
- Physical Harassment. ...
- Power Harassment. ...
- Psychological Harassment. ...
- Cyberbullying. ...
- Retaliation. ...
- Sexual Harassment.

We ask that reporting of this behavior by user or Representative of TFT program is immediate and TFT will block any user/representative from the TFT program in a concerted effort to keep all safely engaging with the program. User and/or Representative (ie: Accountability partner) will not hold TFT liable for any such actions by any 3<sup>rd</sup> party involved in the program knowing that TFT upholds their guarantee no such behavior is tolerated on the platform and accounts will be deleted.

• **Comply with Law.** To comply with applicable law — for example, to comply with a lawful governmental request.

TFT does not use algorithms or profiling to make any decision that would significantly affect you without the opportunity for human review.

TFT retains personal data only for so long as necessary to fulfill the purposes for which it was collected, including as described in this Privacy Policy or in our service-specific privacy notices, or as required by law. We will retain your personal data for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service-specific privacy summaries. When assessing retention periods, we first carefully examine whether it is necessary to retain the personal data collected and, if retention is required, work to retain the personal data for the shortest possible period permissible under law.

#### **TFT's Sharing of Personal Data**

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TFT may share personal data with **service providers** who act on our behalf, our **partners (IE: Training Accountability Partners)**, or others **at your direction**. Further, TFT does not share personal data with third parties for their own marketing purposes.

• Service Providers. TFT may engage third parties to act as our service providers and perform certain tasks on our behalf, such as processing or storing data, including personal data, in connection with your use of our services and delivering products to customers. TFT service providers are obligated to handle personal data consistent with this Privacy Policy and according to our instructions. They cannot use the personal data we share for their own purposes and must delete or return the personal data once they've fulfilled our request.

 Partners. At times, TFT may partner with third parties to provide services or other offerings. For example, TFT may partner with a professional influencer training team to share fitness videos with you of routines the TFT team recommends.

• **Others.** TFT may share personal data with others at your direction or with your consent, such as when we share information with your Accountability partner who will assist you with your training program. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. We may also disclose information about you where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or to protect our operations or users.

#### **Protection of Personal Data at Apple**

At TFT, we believe that great privacy rests on great security. We use **administrative**, **technical**, **and physical safeguards** to protect your personal data, taking into account the nature of the personal data and the processing, and the threats posed. We are constantly working to improve on these safeguards to help keep your personal data secure..

#### Children and Personal Data

TFT understands the importance of safeguarding the personal data of children, which we consider to be an individuals under the age of 15 or the equivalent age as specified by law in your jurisdiction. That is why TFT has implemented additional processes and protections to help keep children's personal data safe.

To access or register for TFT services, a child must have a **parent** register their child for the program and provide a parent's email address for our team.

• **Parents.** To create a child account, parents must review the Family Privacy Disclosure for Children, which describes how Apple handles children's personal data. If they agree, the parent must provide Apple with a verifiable parental consent.

• Educational Institutions. Educational institutions that participate in the TFT Program may also create accounts for students. These schools are required to agree to terms and conditions of TFT. If we learn that a child's personal data was collected without appropriate authorization, it will be deleted as soon as possible.

#### **Cookies and Other Technologies**

TFT websites, online services, interactive applications, and advertisements may use "cookies" and other technologies such as web beacons. These technologies help us to better understand user behavior including for security and fraud prevention purposes, tell us which parts of our websites

# people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

• **Communications Cookies.** These cookies are used to enable network traffic to and from TFT systems, including by helping us detect any errors.

• **Strictly Necessary Cookies.** These cookies are set as required to provide a specific feature or service that you have accessed or requested. For example, they allow us to display our websites in the proper format and language, to authenticate and verify your transactions, and to preserve the contents of your Bag when shopping online at apple.com.

• **Other Cookies.** These cookies are used to understand how visitors interact with our websites and online services, including by helping us to assess the effectiveness of advertisements and web searches. TFT also uses these cookies to remember choices you make while browsing, so we can provide you with a customized experience.

If you prefer that TFT not use cookies, we provide you with the means to disable their use. If you want to disable cookies and you're using the Safari web browser, choose "Block all cookies" in Safari's privacy settings. If you are using a different browser, check with your provider to find out how to disable cookies. Certain features of the TFT website may not be available if all cookies are disabled.

In addition to cookies, TFT uses other technologies that help us achieve similar objectives.

In some email messages TFT sends to you, we provide a "click-through URL" that links you to content on the TFT website. When you click one of these URLs, they pass through a separate server before arriving at the destination page on our website. We track this click-through to help us determine interest in particular topics and measure whether we are communicating with you effectively. If you prefer not to be tracked in this way, you should not click graphic or text links in email messages.

#### TFT generally treats data we collect using these cookies and similar technologies as nonpersonal data.

However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal data by local law, we also treat these identifiers as personal data in those regions. In addition, TFT sometimes combines nonpersonal data collected from these technologies with other personal data TFT holds. When we combine data in this way, we treat the combined data as personal data for purposes of this Privacy Policy.

#### **Our Companywide Commitment to Your Privacy**

To make sure your personal data is secure, we communicate our privacy and security guidelines to TFT Personnel & Accountability partners and strictly enforce privacy safeguards within the company.

### **Privacy Questions**

If you have questions about TFT's Privacy Policy or privacy practices, and would like to contact our Data Protection Officer, or would like to submit a complaint, you can contact us at TFT/legal/privacy/<sub>COM</sub>. You can also ask us questions about how to submit a privacy complaint and we will endeavor to help.

TFT takes your privacy questions seriously. A dedicated team reviews your inquiry to determine how best to respond to your question or concern, including those inquiries received in response to an access or download request. In most cases, all substantive contacts receive a response within seven days. In other cases, we may require additional information or let you know that we need more time to respond.

Where your complaint indicates an improvement could be made in our handling of privacy issues, we will take steps to make such an update at the next reasonable opportunity. In the event that a privacy issue has resulted in a negative impact on you or another person, we will take steps to address that with you or that other person.

If you are not satisfied with TFT's response, you may refer your complaint to the applicable regulator. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

When there is a material change to this Privacy Policy, we'll post a notice on this website at least a week in advance of doing so and contact you directly about the change if we have your data on file.

Training For Teens, 1100 Maxwell Lane, Unit 404 Hoboken, NJ 07030;201-208-0452