**Privacy Policy for Pulll Mobile App**

*Last updated: February 18, 2018*

Your privacy is important to Pelotonia LLC ("Pelotonia"). We developed this Privacy Policy to provide you with information on how we collect, use, share and store your Personal Information when you use the Pulll mobile application (the "Pulll App").

**Ways Pelotonia Collects and Uses Personal Information**

"Personal Information" is information that, either alone or in combination with other information collected, identifies an individual. When we combine other information (i.e., information that does not, on its own, identify an individual) with Personal Information, we treat the combined information as Personal Information.

**When You Create a Pulll Account**

When you create a Pulll account, we will ask you to provide Personal Information, including your email address and name. You will use your email address and your password to log into your account. Your Pulll account will be password-protected. You may add additional information to your profile, such as a profile photo, types of activities you participate in (e.g., running or cycling), birthdate and your location. In order to share ride information through the PULLL App, you will need to enable GPS location tracking.

**When You Share Your Activities and Activity Data**

The Pulll App allows you to share your account information with others. You control the sharing of account information by managing the privacy settings in your Pulll App. Your account is set to "Private" by default. But you can select to share your account information with the public instead. Depending on your privacy setting, you may be able to share certain account information with the public. This information may include ride details, a map of your ride, including GPS information, or any content you create in the Pulll App. When you make this information available to the public, please be aware that you no longer control how others share or use this information. Even if your account is set to "Private", others will be able to search for your account profile in the Pulll App, but they will only be able to see your name and profile photo.

**When You Connect Your Pulll App to a Third-Party App**

If you enable your Pulll account to access accounts you have with other app providers, such as MapMyRide® or Strava®, we will obtain information about you and your activities from such accounts (e.g.,date, route, time, distance, etc.).

You may also choose to provide the Pulll app with access to your contacts on your mobile device. If you choose to do so, we use such information to help you add your contacts as connections in the Pulll App. We do not use your friends list or contacts for purposes of

marketing specifically to your contacts, but you have the ability to invite your contacts to download the Pulll App.

**When You Communicate with Us**

When you interact with our support representatives via email, telephone, or online, we may collect Personal Information, such as your name, mailing address, phone number, email address and contact preferences. We also may create event logs that are useful in diagnosing app performance related issues. We use this information to provide you with app support or other assistance you may require. We may access your Pulll account in order to assist us in providing you the necessary assistance.  To improve our service, subject to applicable laws, we may also record and review conversations with support representatives.

We may use Personal Information to communicate with you, including communicating with you about your account or transactions with us, giving you important information about the app or fundraising activities, sending you notice about material changes to this Privacy Policy, and, consistent with applicable laws and the choices available to you as described below under **Your Choices Regarding Sharing of Content**, sending you messages about content that may be of interest to you.

**When You Grant Permissions to the Pulll App**

To help give you a more personalized user experience, the Pulll App requests permission to access certain data from your mobile phone (e.g., SMS, Phone, Contacts, Location). These permissions are optional, but some features may not be available or fully functional if you decline them. You can change your mind (either to opt-in or opt-out) at any time through the settings menu of your mobile phone.

**When You Use Location Features on Your Pulll App**

If you activate the GPS feature during an activity, then location data associated with your activity will be tracked by the Pulll App. You will also be able to share or restrict the location for your activity, depending on your selection. You will have the option of including or removing maps from your activity summary.

**Other Uses of Personal Information**

We also may use your Personal Information for internal statistical, marketing or operational purposes, including generating fundraising reports and measuring and understanding demographics, user interests, purchasing and other trends among our customers.

**Ways You May Share Your Personal Information or Direct Us to Share Your Personal Information**

**Activities and Activity Data**

Your activities and activity data associated with your Pulll App account are set to "Private" by default.  You may decide to allow the public to view your activities and activity data by changing the privacy settings in your Pulll account.

We will not transfer or sell your personal activity data to any third party without providing you prior notice and obtaining your consent.

**Data You Direct Pelotonia to Share**

You may direct us to share your Personal Information with other individuals or entities.  For example, you might authorize us to permit a third party to make donations to your fundraising campaign through the Pulll App. We will not do this without your consent. We may, however, share aggregate information (that is information which does not identify you individually), with third parties. Once you direct us to share data with a third party, the third party's handling of your Personal Information is the responsibility of that third party.  If that third party is an entity, you should carefully review that entity's privacy policy. You can choose to stop sharing data with a third party at any time within your Pulll App by adjusting your privacy settings.

**Promotions**

If you enter a sweepstakes, contest or similar promotion, we may use the information you provide to administer those promotions.  To the extent that the terms and conditions of any such promotion regarding the treatment of Personal Information about you conflict with this Privacy Policy, the terms and conditions of the promotion will control.

**Communication through the Pulll App**

The Pulll App does not provide any features through which you can post information, messages, materials, or communicate with other users of the Pulll App. While others may be able to see your ride information, based on your privacy settings, nobody will be able to comment on your ride

**Tracking Technology**

We collect data from users about their usage of the Pulll App.  The types of analytical information that are collected include the date and time the app accesses our servers, app version, the location of the device, language setting, what information and files have been downloaded to the Pulll App, user behavior (e.g. what features used, frequency of use), device state information, device model, hardware and operating system information, and information relating to how the app functions.  We use this data to improve the quality and functionality of the Pulll App; to

develop and market products and features that best serve you and other users; and to help identify and fix app stability issues and other usability problems as quickly as possible.

Here are examples of third-party providers of analytics and similar services we currently use:

- **Analytics Services:**

  **Google:**  Google Analytics is used to track site statistics and user demographics, interests and behavior on websites.  You can find out more information on how this analytics information may be used, and on how to control the use of your information, by clicking here.

- **Social Networks:**  Third-party social networks who provide interactive plug-ins or social networking features (for example, to allow you to connect to Facebook or Google to find friends to add as connections or to "Like" a page) on the Pulll App, may use cookies or other methods (for example, web beacons) to gather information regarding your use ofthe Pulll App.  The use of such information by a third party depends on the privacy policy available on that social network's website, which we encourage you to review carefully. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your use of the Pulll App with any of your Personal Information that they may have.

**Sharing Personal Information With Content or Feature Providers**

Subject to applicable laws, Pelotonia may share activity data, excluding location information, with companies that provide donations to fundraising campaigns in a de-identified, aggregated manner.

**Other Disclosures**

We may disclose Personal Information about you to others if we have your consent to do so in such form of consent as may be required under applicable law.

Subject to applicable laws in your jurisdiction, we may also disclose Personal Information about you to others as we believe to be necessary or appropriate: (a) under applicable law or regulation, including laws or regulations outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public authorities and law enforcement officials, including officials outside your country of residence; (d) to assist or support investigations involving Pelotonia, (e) to enforce any of our terms and conditions or policies; (f) to protect our operations or those of any of our affiliates and subsidiaries; (g) to protect the rights, privacy, safety or property of Pelotonia, you or others; or (h) to permit us to pursue available remedies or limit the damages that we may sustain.

We may also transfer Personal Information to an affiliate, a subsidiary or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Pelotonia's business, assets or stock.

**Links, Third Party Apps and Third Parties' Privacy Practices**

The Pulll App may contain links to other sites or apps that are not operated by Pelotonia. These linked sites and apps are not under our control, and we are not responsible for the privacy practices or the content of any linked sites and apps. If you use any third-party sites or apps, any Personal Information collected by the third party's site or app will be controlled by the privacy policy of that third party. We recommend that you carefully review the Privacy Policies of any third parties to which you provide Personal Information.

**Data Storage Location**

When you provide information to Pelotonia or upload activity data into the Pulll App, your Personal Information and activity data will be collected and stored by Pelotonia in the United States. Your Personal Information may also be collected and stored on servers in the country or region where you reside or use your mobile device. If you reside in a country outside the United States, please note that the data protection and privacy laws of the United States may not be as comprehensive as the laws in your country.

**Security**

We are committed to protecting the security of your Personal Information. We use technical and organizational measures designed to protect your information against unauthorized access, theft, and loss. We also recommend that you take additional measures to protect yourself and your information, such as installing anti-virus software, closing browsers after use, keeping confidential your log-in credentials and passwords, and making sure that you regularly update software and apps you have downloaded to ensure you have enabled the latest security features on your devices.

**Your Choices Regarding Sharing of Content**

Pelotonia may use your Personal Information to send you messages (including emails) related to Pelotonia fundraising campaigns, content that we believe may be of interest to you, or products in accordance with your notification preference. We do not share Personal Information with third parties for the third parties' marketing purposes.

To opt out of receiving content-based correspondence from Pelotonia, please update your notification preference in the privacy settings of the Pulll App or click "Unsubscribe" from any marketing email you receive from us.

**Policy with Respect to Children**

The Pulll App is not directed to individuals under the age of 16, and we request that individuals under 16 not provide Personal Information to Pelotonia. If we learn that we have collected the Personal Information from a child under 16, we will take steps to delete the information as soon as possible.

**Privacy Policy Updates**

We may change this Privacy Policy from time to time as we add new features, as we improve our current offerings and as technologies and laws change. Any changes will become effective upon our posting of the revised Privacy Policy.

Consistent with applicable laws, this notice will be provided by email or by posting notice of the changes through the Pulll App.

**Retention of Personal Information**

We will retain your Personal Information for the period necessary to fulfill the purposes for which your Personal Information has been collected as outlined in this Privacy Privacy unless a longer retention period is required by law. Additionally, as permitted by applicable laws, we may need to retain certain Personal Information for a longer period of time for recordkeeping purposes, such as retaining records relating to your purchases for warranty or accounting purposes.

**How You Can Review, Correct, Update and Delete Your Personal Information**

We take reasonable steps to help ensure that the Personal Information we collect from you is accurate, complete and current. You may request access to your Personal Information and request that erroneous or inaccurate Personal Information be updated. You may also request that your Personal Information and the Pulll App account be deleted. We will respond promptly to your requests in accordance with applicable law. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We may 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.

Access, correction or deletion requests can be made as follows:

**Email:**

support@pulll.org

**Mail:**

Pulll

351 W. Nationwide Blvd.

Columbus, OH 43215