

Thrive Companies Privacy Policy

Last Updated: October 2024

Thrive Companies, its affiliates, and its wholly owned subsidiaries (“**Company**,” “**we**,” or “**us**”) recognizes the importance of data privacy and information security. This Privacy Policy sets forth the terms and conditions with respect to how we process personal information. This Privacy Policy describes, among other issues, the types of personal information that we collect, the purposes for which we use it, the types of third parties with whom we share it, and any rights and responsibilities you may have with respect to such personal information.

This Privacy Policy applies to the personal information you provide us when you (i) visit any website that we own, license, maintain or otherwise operate and that links to this Privacy Policy (each, a “**Site**”), (ii) purchase or receive products, goods, or services through the Site, or (iii) visit our facilities or otherwise contact or engage with us. For purposes of this Privacy Policy, the Site and all products, goods and services sold or furnished by Company through a Site shall be referred to collectively as the “**Services**.”

PLEASE READ THIS PRIVACY POLICY CAREFULLY AS IT DESCRIBES YOUR RIGHTS, RESPONSIBILITIES, AND LIABILITIES. BY ACCESSING OR USING THE SERVICES OR OTHERWISE PROVIDING US WITH PERSONAL INFORMATION, YOU ARE CONSENTING TO THE TERMS OF THIS PRIVACY POLICY AND OUR TERMS & CONDITIONS AND ANY APPLICABLE COOKIE POLICY ON A SITE.

You must be at least eighteen (18) years of age to access the Services. Company is headquartered in the United States, and the personal information you provide to Company may be processed and stored in the United States and other jurisdictions. For more information on our data transfer practices, please see Section 9 (Data Retention and Localization).

1. Scope

This Privacy Policy applies to personal information that Company receives during its business operations as a “data controller” - which means we determine the purpose and means of processing such personal information. For purposes of this Privacy Policy, the term “**personal information**” means any information that, alone or in conjunction with other information or data, identifies or can be associated with a particular individual or household and that is subject to, or otherwise afforded protection under, a data protection law, statute, or regulation. The term “personal information” does not include anonymized or de-identified data that is not attributable to a particular individual or household and that is not otherwise subject to a data protection law, statute, or regulation. Company may anonymize or de-identify personal information, and such data is not subject to this Privacy Policy, and Company may use such data for any purpose.

2. The Types and Categories of Personal Information We Collect

Company collects personal information in order to provide our Services, comply with our legal obligations, promote our business interests, manage employment relationships and benefit programs, and for the other reasons set forth in this Privacy Policy. When you choose not to provide personal information to Company, we may not be able to provide you the Services or to complete a transaction you requested. Generally, we may from time to time collect the following

types and categories of personal information during our business operations:

Personal Information	
Category	Description/Examples
Personal Identifiers	Identifiers, such as your name, alias, shipping address, email address, account name, telephone number, customer identification number.
Registration Information	Information provided when you register for an account to use the Site, including usernames and passwords.
Online Identifiers (For more information, see “Technical Data” below)	Persistent identifiers that can be used to recognize you or your device over time and across different services, including a device identifier, an Internet Protocol (IP) address, cookies, beacons, pixel tags, mobile ad identifiers, and similar technology.
Athletic Facilities Use	Information regarding your use of and preferences regarding our athletic services.
Commercial Information	Records of the Services you selected, purchased, obtained, or considered, or your other purchasing or consuming histories or tendencies with respect to our Services.
Chat and Other Communications Content	Information you provide or disclose in the course of interacting with an automated chat (i.e., chat “bot”) or live chat, or other similar interactive feature of our websites.
Business Contact Data	Information related to employees, owners, directors, officers, or contractors of a third-party organization (e.g., business, company, partnership, sole proprietorship, nonprofit, or government agency) with whom we conduct, or possibly conduct, business activities.
Health and Disability Data	You may furnish us with health-related information in the event we undertake health screening or accommodate a disability when you engage with us.
Marketing and Communications Data	Information with respect to your marketing preferences and your subscriptions to our publications and alerts.
Internet and Electronic Network Data	Data pertaining to your access or use of the Site, including browsing history, search history, and information regarding your interaction with the Site or advertisements embedded on the Site or other third-party websites, and information derived from any device that connects to our WiFi services.
Your Feedback	Information you provide about our Services, which may include data gathered from any Company surveys or reviews submitted by you.
Visitor Information	Information an individual provides when visiting any physical location or premises of Company (e.g., visitor logs and registries, vehicle and parking information).
Video and Images	In some circumstances, you may provide us images (e.g., your use of a product) or we may record you via a video camera (e.g.,

	on-premises security systems) or through video conferencing.
Geolocation Data	Information about the general city, state, or region in which a user of the Site is located.
Professional or Employment Data (For more information, see “Employment Applications and Talent Management” below)	If you apply for or accept a job with Company, we collect information set forth in a resumé, curriculum vitae, cover letter, and similar documentation, including contact details, employment history, skills, or qualifications, education-level, job compensation and benefit preferences, criminal record, credit history and similar data, and information provided about or by your references.
Inferences	Inferences drawn from some of the personal information categories identified herein and used to create a consumer profile reflecting your purchasing and marketing preferences, characteristics, and behavior.

3. Technical Data

When you access the Site, we collect certain data automatically using technical means and tools. This data relates to your device, as well as your experience on the Site and other websites, including the following:

Usage and Device Data. When you access and use the Site, we automatically collect details of your access to and use of the Site, including traffic data, usage logs and other communication data, and the resources that you access and use on or through the Site (e.g., browsing history, search history). We may also collect information about your device and internet connection, including the device’s unique identifier (e.g., device type, IMEI, Wi-Fi MAC, IP address), operating system, browser type, and mobile network information. The Site may collect “diagnostic” data related to your use of the Site, such as crash data and logs, performance data (e.g., launch time, hang rate, or energy use), and any other data collected for the purposes of measuring technical diagnostics.

Cookies and Tracking Data. We use “cookies” and other tracking technologies within the Site. A cookie is a small file placed on your smartphone or other device. It may be possible to refuse to accept cookies by activating the appropriate setting on your smartphone or device. However, if you select this setting, some parts of the Site may become inaccessible or not function properly. In addition, the Site may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us to analyze data on your use of the Site (e.g., recording the popularity of certain content and verifying system and server integrity). The Site may collect data about the advertisements you have seen or engaged. For more information, see, where available, the Cookie Policy on each Site.

Site Monitoring. Please be aware that we use cookies and other tracking technologies within the Site to monitor and record any and all activities and communications to, from, and on, the Site in order to safeguard, improve, and analyze usage of, the Site, and for the other purposes listed in this Privacy Policy. For the avoidance of doubt, you hereby acknowledge, agree, and consent to, such monitoring and recording.

Audio and Visual Materials. Our Site may, from time to time, display live or prerecorded videos or similar audio-visual materials (“**Videos**”). We may collect personal information with respect to you requesting access to, and/or accessing, such Videos, and we may disclose such personal information to third parties, including to our third-party service providers through the use of cookies. The provision of Videos on our Site is not an admission by Company and it shall not otherwise be interpreted, in any form or manner, to mean that Company is a “video tape service provider” for purposes of the Video Privacy Protection Act (codified as amended at 18 U.S. Code § 2710) (the “**VPPA**”) or that Company is otherwise subject to the VPPA.

4. Sources of Information

We collect the personal information identified herein directly from you when you use our Services, through automated means when you are using the Site, and from third parties. More specifically, we collect personal information from the following sources:

First Party / Direct Collection. We collect personal information directly from you when you use our Services, communicate with chat or other similar features when visiting our websites, or whenever you directly engage with us, such as when you visit our offices or premises or otherwise contact us.

Automated Collection. As described above, we may collect information and data, such as usage data and cookies, through automated means when you use the Site (see “Technical Data” above).

Third-Party Sources. We collect personal information from third parties, such as publicly available databases, social networking providers, advertising companies, our service providers, and third-party references.

5. How We Use your Information / Purpose of Collection

We may use the personal information we collect about you in order to perform our Services, comply with our legal obligations, and promote our business interests.

How Your Personal Information Is Used
Provide, operate, maintain, improve, and promote our Services.
Enable you to access and use our Services.
Process and complete transactions, and send you transaction related information, including purchase confirmations and invoices.
Send you messages and communications related to our Services (e.g., responses to your comments, questions, and requests, customer services), including by email, chat and text messages.
Furnish technical notices, updates, security alerts, and support and administrative messages to you about our Services.
Provide you promotional and marketing communications (e.g., information about our Services, features, surveys, newsletters, offers, promotions, contests, and events).
Monitor and analyze trends, usage, and activities in connection with our Services to promote our business interests.
Investigate and prevent fraudulent transactions, unauthorized access to or use of our Services,

and other illegal activities.
Personalize our Services, including providing features or advertisements that match your interests and preferences.
Company may collect and use your personal information for any other purpose for which we obtain your consent.

6. Sharing Information / Third-Party Disclosures

We share your personal data as described below and in this Privacy Policy, and as permitted by applicable law.

Category of Recipient	Purpose of Disclosure
Intra-Group	We may share your personal data with our parent company, and our affiliates, and subsidiaries.
Service Providers	We share personal data with third parties in connection with the delivery of our Services (e.g., credit card processing, customer service, business analytics, fraud prevention, legal compliance services, and advertising and marketing), and in connection with the operation, maintenance, and monitoring of our digital properties, including our websites, and of digital features that third parties manage for us including chat features on our websites .
Business Partners	We may share your personal data with third parties that distribute our goods, products, and marketing materials.
Business Restructuring	Circumstances may arise where, for strategic or other business reasons, we decide to sell, buy, divest, merge or otherwise reorganize our businesses. We may disclose your personal data to the extent reasonably necessary to proceed with the negotiation or with the completion of a merger, acquisition, divestiture or sale of all or a portion of our assets.
Legal; Compliance; Legitimate Interests	We may disclose personal data (i) if required by law or government order, or with a legal process, (ii) to protect and defend our rights or property, or (iii) in urgent circumstances, to protect the health and personal safety of any individual. In addition, we may disclose your personal data with any third party when we believe such disclosure is necessary to defend or protect our legal, regulatory, or business interests.
Consent	In addition to the reasons for disclosure set forth herein, we may also disclose your personal data upon your consent.

In the event that you facilitate a transaction with Company, interact with communications features on our websites (such as chat features) or request information from or otherwise engage with us, and such activities require Company to provide access to or share your personal information with a service provider or other third party, you hereby consent to such disclosure and/or direct Company to intentionally disclose your personal information to the service provider or third party.

7. Social Media

We may engage with you on various social media platforms (e.g., Facebook, Twitter, Pinterest, Instagram). If you contact us on a social media platform for customer support or for other reasons, we may contact you via the social media's direct message tools. Certain social media platforms may also automatically provide us with your personal information, the information we receive will depend on the terms that govern your use of the social media platform(s) and any privacy settings you may have set. The Site includes social media features and widgets (e.g., the "Facebook Like" button, the "Share This" button) or interactive mini-programs that run on the Site. These features may collect your IP address and which Site page you are accessing and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Site. Your interactions with these features are governed by the privacy statement of the relevant social media platform that provides them.

8. Links to Other Websites; Your Direct Third-Party Disclosures

As a resource to you, the Site may include links to third-party websites or provide you the opportunity to disclose information directly to third parties (e.g., credit card processors). Our Privacy Policy does not apply to such third-party websites or organizations. You assume all privacy, security, and other risks associated with providing any data, including personal information, to third parties via the Services. For a description of the privacy protections associated with providing information to third parties, you should refer to the privacy statements, if any, provided by those third parties.

9. Data Retention and Localization

The period during which we retain your personal information varies depending on the purpose for the data processing. For example, we retain personal information for as long as needed to provide you with our Services, to facilitate transactions you have requested, to comply with our legal obligations (e.g., tax filings, export control laws), to engage in marketing activities, and for as long as is necessary to defend our legal or business interests. In all other cases, we retain your personal information for as long as is needed to fulfill the purposes outlined in this Privacy Policy.

The personal information that we collect and process is primarily retained and stored in the United States. Company uses service providers that store personal information on our behalf in the United States and in other third countries. Please be aware that the United States, and these other third countries, may not provide the same level of protection of personal information as in your country, state, or other jurisdiction of residence or nationality, and when transferred to the United States or elsewhere, your personal information may be accessible by, or otherwise made available to, local government authorities and officials pursuant to judicial or administrative orders, decrees, and demands, and/or other domestic laws, statutes, and regulations. By continuing to provide us such information, you hereby acknowledge and agree that your personal information will be transferred to, and stored in, the United States and in such other third countries.

10. Security

We seek to protect the security of your personal information and use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. HOWEVER, NO INFORMATION SYSTEM CAN BE FULLY SECURE, AND WE CANNOT GUARANTEE THE ABSOLUTE SECURITY OF YOUR PERSONAL

INFORMATION. MOREOVER, WE ARE NOT RESPONSIBLE FOR THE SECURITY OF PERSONAL INFORMATION YOU TRANSMIT TO THE SITE AND/OR THE SERVICES OVER NETWORKS THAT WE DO NOT CONTROL, INCLUDING THE INTERNET AND WIRELESS NETWORKS, AND YOU PROVIDE US WITH ANY PERSONAL INFORMATION AND DATA AT YOUR OWN RISK. TO THE EXTENT PERMITTED BY LAW, WE SHALL NOT BE LIABLE OR OTHERWISE RESPONSIBLE FOR ANY DATA INCIDENT OR EVENT THAT MAY COMPROMISE THE CONFIDENTIALITY, INTEGRITY, OR SECURITY OF YOUR PERSONAL INFORMATION CAUSED BY A THIRD PARTY. The safety and security of your personal information also depends on you. Where we have given you (or where you have chosen) a username and password to access our Services, you are responsible for maintaining the security and confidentiality of those credentials and not revealing them to others. You must contact us immediately (and in any event within twenty-four (24) hours) if you have reason to believe that your username or password to our Services has been compromised. You acknowledge and agree that we may contact you via email or other electronic communications in the event we are legally required to notify you of a data security incident or event related to your personal information.

11. No Data Collected from Children

The Site is not directed at, nor intended for use by, children. As a result, if you are under the age of sixteen (16), you are prohibited from accessing or using the Services (including the Site) or with providing us with your personal information.

12. Publicly Posted Information; Product Reviews

You may, from time to time, have the ability to submit via the Site a comment on, provide an opinion about, rate, or otherwise discuss our Services (a “**Review**”). In other circumstances, you may directly provide us feedback on our business, our business sector, or the Services (“**Feedback**”). Any information or content you post in a Review or in your Feedback may be available to other users of the Site (and our social media platforms) and may be retrievable by third-party search engines, and third parties may also be able to download or share your Review and Feedback to social media websites or elsewhere. We recommend that you guard your privacy and anonymity and not upload any information in your Review and Feedback that you wish to remain confidential. Any third party with access to your information via the Site will be permitted to use the information in the same manner as if you submitted the information directly to that third party. Publicly posting any information on the Site is entirely voluntary on your part, and we recommend you carefully consider the information you choose to make publicly available. As between you and Company, any and all Reviews and Feedback shall be considered our confidential and proprietary information. In order for Company to utilize such Reviews and Feedback, you grant to Company a non-exclusive, perpetual, irrevocable, worldwide, royalty-free license, with the right to sublicense, under all relevant intellectual property rights, to use, publish, and disclose such Reviews and Feedback in any manner we choose and to display, perform, copy, make, have made, use, sell, and otherwise dispose of Company’s and our sub-licensees’ products or services embodying such Reviews and Feedback in any manner and via any media we choose, without reference to the source. Company shall be entitled to use Reviews and Feedback for any purpose without restriction or remuneration of any kind with respect to you and/or your representatives.

13. Your Responsibilities

You are permitted, and hereby agree, to only provide personal information to Company if such personal information is accurate, reliable, and relevant to our relationship and only to the extent

such disclosure will not violate any applicable data protection law, statute, or regulation or infringe upon a person's data privacy rights or privileges. IF YOU PROVIDE PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO COMPANY, YOU EXPRESSLY REPRESENT AND WARRANT TO COMPANY THAT YOU HAVE THE FULL RIGHT AND AUTHORITY TO PROVIDE COMPANY WITH SUCH PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) AND THAT COMPANY'S USE AND PROCESSING OF SUCH PERSONAL INFORMATION AS SET FORTH HEREIN WILL NOT VIOLATE ANY PERSON'S RIGHTS OR PRIVILEGES, INCLUDING RIGHTS TO PRIVACY. YOU HEREBY AGREE TO FULLY AND COMPLETELY INDEMNIFY COMPANY FOR ANY CLAIMS, HARM, OR DAMAGES THAT MAY ARISE FROM YOUR PROVISION OF PERSONAL INFORMATION (INCLUDING PERSONAL INFORMATION CONCERNING A THIRD PARTY) TO COMPANY.

14. Updating Your Information

It is important that the personal information that you provide to us is accurate and reliable. In certain circumstances, you may have the ability to directly edit your account to update and change your personal information (e.g., name, telephone number, email), and you must do so when such changes are warranted. You may review, update, or modify your personal data, including profile and contact information, at any time by contacting us in accordance with the "Contact Us" section below.

15. Email Marketing and Your Rights

You have the right to opt out of receiving email marketing communications from us. Generally, the email marketing communications that you receive from us will provide you an option to "unsubscribe" from receiving future email marketing communications from us. You may also unsubscribe from such email marketing by contacting us in accordance with the "Contact Us" section listed below. You hereby agree to immediately notify Company, in writing, in the event you no longer own, license, or use an email address to which you subscribed to receive email marketing from us.

16. Your Privacy Rights

Data Privacy Rights. You may be entitled to certain privacy rights under laws that may apply to you based on your state of residence or location:

- ***Right to Know*** (Specific Pieces of Personal Information). You may have the right to know the specific pieces of your personal information that we have collected about you.
- ***Right to Know*** (Categories of Personal Information). You may have the right to know (i) the categories of personal information we have collected from you; (ii) the categories of sources from which the personal information is collected; (iii) the categories of your personal information we have sold or disclosed for a business purpose; (iv) the categories of third parties to whom your personal information was sold or disclosed for a business purpose; and (v) the business or commercial purpose for collecting or selling your personal information.
- ***Right to Delete.*** You have the right to request that we delete your personal information that we have collected and retain.
- ***Right to Correct.*** You have the right to request that we correct inaccurate personal information that we have collected and retain.

- *Nondiscrimination.* You have the right not to be subject to discrimination for asserting your rights.

Submit a Privacy Request. To submit a privacy request, you (or your authorized agent) may contact us using the “Contact Us” section below. An authorized agent must be registered with the California Secretary of State to conduct business in California.

Privacy Request Verification Process. If you (or your authorized agent) make any request related to your personal information, Company will ascertain your identity (and the identity of the authorized agent, to the extent applicable) to the degree of certainty required or permitted under the law before addressing your request. In particular, Company will, to the extent required or permitted by law, require you (or your authorized agent) to verify your request via email, request certain contact information or government identifiers, and we will match at least two pieces of such personal information with data that we have previously collected from you before granting you access to, erasing, or correcting, specific pieces or categories of personal information, or otherwise responding to your request. We may require written documentation that demonstrates a third party is authorized to serve as your agent for the purposes of submitting the requests set forth herein, unless you have provided the authorized agent with power of attorney.

Opt-Out Rights / Do Not Sell My Personal Information. You may have the right to opt out of the “sale” of their personal information. However, Company does not sell your personal information to third parties for profit or monetary or other valuable consideration, and therefore we do not provide opt-out request processes for the sale of personal information (because we do not undertake such activities).

Opt-Out Rights / Do Not Share My Personal Information. You may have the right to opt out of the “sharing” of their personal information. While Company currently does not share your personal information as that term is defined in applicable law, it is possible that Company may use third-party analytical and targeted advertising features on our Site and similar web tools provided by our marketing partners, and such features, tools and marketing relationships then might involve the disclosure of your personal information to third parties and may constitute the “sharing” of your personal information. To inquire as to whether we may share your personal information and, if so, to opt out of this sharing of your personal information in these circumstances, please click on the cookie management tool (sometimes visible as a “Your Privacy Choices” or a “Do Not Sell/Share My Personal Information” link on the footer of the Site) to set your cookie preferences. You, or your authorized agent, may also contact us in accordance with the “Contact Us” section listed below.

Limit Use of Sensitive Personal Information. Company does not use or disclose sensitive personal information for reasons other than those expressly permitted by applicable law, and therefore we do not provide individuals with the ability to limit how we use or disclose such sensitive personal information.

California “Shine the Light”. Under California Civil Code Section 1798.83 (“Shine the Light”), California residents have the right to request in writing from businesses with whom they have an established business relationship: (a) a list of the categories of personal information, as defined under Shine the Light, such as name, email address, and mailing address, and the type of services provided to the customer that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes; and (b) the names and addresses of all such third parties; however, we do not disclose personal data to third parties for their direct marketing purposes.

17. European Union (EU), Switzerland, and United Kingdom (UK)

Data Protection Rights. If you are located in the EU, Switzerland, or the UK, you have the following data protection rights:

- **Right to Know.** The right to know about what personal information Company collects and processes about you, including the types and categories of personal information we collect and process, the sources of such personal information, our retention criteria, with whom we share your personal information, cross-border data transfers, and how to file complaints and inquiries. Such information is set forth in this Privacy Policy.
- **Automated Decision Making.** Company does not engage in any activity that subjects our customers, Site users, survey participants, or others to a decision based solely on automated processing, including profiling, which produces legal effects, or similarly significant results, impacting them.
- **Access Rights.** You may ask us whether we process any of your personal information and, if so, receive access to such personal information. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal information concerned as well as any other information necessary for you to exercise the essence of this right.
- **Rectification.** You have the right to have your personal information corrected/rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal information about you and, taking into account the purposes of the processing, update any incomplete personal information, which may include the provision of a supplementary statement.
- **Erasure.** You have the right to have your personal information erased, which means the deletion of your personal information by us and, where possible, any other controller to whom your data has previously been disclosed. However, your right to erasure is subject to statutory limits and prerequisites (e.g., where your personal information is no longer necessary in relation to the initial purposes for which it was processed, your personal information was processed unlawfully).
- **Restriction of Processing.** You have the right to obtain the restriction of the processing of your personal information, which means that we suspend the processing of your personal information for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal information is contested, but we need time to verify the inaccuracy (if any) of your personal information.
- **Data Portability.** You have the right to request us to provide you with your personal information in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible.
- **Right to Object.** You have the right to object to the processing of your personal information, which means you may request us to no longer process your personal information. This only applies in case the “legitimate interests” ground (including profiling) constitutes the legal basis for processing (see below “Legal Basis for Processing”). However, at any time (and free of charge) you can object to having your personal information processed for direct marketing purposes.
- **Withdrawing Consent.** You also may withdraw your consent at any time if we are solely relying on your consent for the processing of your personal information. However, this will not impact our legal basis to process such personal information prior to the withdrawal of your consent.

To exercise any of these data privacy rights, please contact us, or have your designated agent contact us, in accordance with the “Contact Us” section listed below. To the extent permitted by law, we will need to verify your identity (or the identity of your agent) and ensure the authenticity of your request.

Legal Basis for Processing. We process your personal information in accordance with the legal bases set forth in law. For example, our processing of personal information (as described herein) is justified based on the following legal grounds:

- **Consent.** Processing is based on your consent (e.g., you register to receive our marketing materials, you voluntarily contact us).
- **Legitimate Interests.** Processing is necessary for our legitimate interests as set out herein (e.g., monitoring your use of the Site and your compliance with the terms and conditions governing the same, improving our Services).
- **Contract Undertaking.** Processing is necessary for the performance of a contract to which you are a party (e.g., you purchase or consider purchasing our Services).
- **Legal Compliance.** Processing is required to comply with a legal or statutory obligation (e.g., tax disclosures).

Complaints. In the event you have concerns about our data processing, you have the right to file a complaint with your data protection authority.

- For data protection authorities in the EU, please see here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.
- For the data protection authority in Switzerland, please contact the Federal Data Protection and Information Commissioner (<https://www.edoeb.admin.ch/edoeb/en/home.html>).
- For the data protection authority in the UK, please contact the Information Commissioner’s Office (www.ico.org.uk).

We would, however, appreciate the opportunity to deal with your concerns before you approach a data protection authority with a complaint, and invite you to contact us in the first instance.

18. Do-Not-Track Signals

Some web browsers may transmit “do-not-track” signals to the website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they are even aware of them. Unless otherwise required by law, we currently do not take action in response to these signals.

19. Persons with Disabilities

Company strives to ensure that every person has access to information related to our Services, including this Privacy Policy. Please contact us if you would like this Privacy Policy provided in an alternative format, and we will seek to meet your needs.

20. Rewards Programs and Financial Incentives

We may collect and use personal information, including personal information provided by a third party to administer and maintain our financial incentive, rewards, and loyalty programs (“**Rewards**

Programs”). We use the personal information you provide in these programs to verify your identity, offer unique rewards, track your program status, and facilitate the exchange of program points for products, promotional materials, training workshops, and other items. If you consent to participate in any of our Rewards Programs, you may withdraw that consent at any time by contacting us in accordance with the “Contact Us” section listed below or in accordance with the instructions set forth in the applicable Rewards Program’s terms and conditions. Company may use personal information gathered from, or related to, participants in our Rewards Programs for any other purpose or in any other manner set forth in this Privacy Policy.

21. Employment Applications and Talent Management

As part of our recruitment and talent management process, we collect personal information with respect to individuals who are interested in working for us. In this context, we collect employment and application data, such as the following: contact information (e.g., name, title, residential or postal address, telephone number, and personal email address); information in a curriculum vitae, resumé, cover letter, or similar documentation; details regarding the type of employment sought, willingness to relocate, job compensation and benefit preferences; health data (e.g., medical conditions); information related to your background, education, criminal record, credit history and similar data; information provided about or by your references or other third parties related to your employment history, skills, qualifications, or education; and information related to previous applications to us or previous employment history with us. When permitted by law, we may collect information about your race and ethnicity to assist with our diversity and inclusion programs. We use this information for the following purposes: to identify and evaluate job applicants; to verify your information; to complete employment, education, background and reference checks; to communicate with you about the recruitment process and your application; to comply with our legal, judicial, regulatory, administrative, or other corporate requirements; to analyze and improve our application and recruitment process; to accommodate individuals who may have specialized needs during the employment process; and to protect the rights, interests, and property of our business, other job applicants, employees, or the public, as required, or permitted, by law. We share this personal information with third parties (see “Sharing Information / Third-Party Disclosures”), and we may also use this employment and application data for any other purpose set forth in this Privacy Policy.

22. Events and Video Teleconferencing

Company hosts and uses video teleconferencing platforms to facilitate conferences, meetings, training events, and other programs. We often use online platforms that are owned and administered by a third-party service provider (e.g., Google, Zoom, WebEx, Skype for Business). Please be aware that our video teleconferencing may record the content, conversations, and discussions thereon, and such records may be stored or retained by our third-party service providers. By participating in our events and video teleconferencing, you hereby consent to the collection and retention of any information provided therein, and you hereby consent to the recording of such activities.

23. Changes to the Policy

We reserve the right to amend this Privacy Policy at any time. We will notify you if this Privacy Policy is amended by updating the “Last Updated” section listed above. It is your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made hereto. Your use of the Services and continued use of the Services after any amendments are made to this Privacy Policy, signifies your consent to this Privacy Policy and any amendments

hereto. We may, in our sole discretion, provide you communications, including via email or text messages, about changes to our Privacy Policy; however, such communications do not abrogate or otherwise limit your responsibility to periodically review the Privacy Policy to determine whether any amendments have been made hereto.

24. Contact Us

If you have questions regarding this Privacy Policy or our handling of your personal information, would like to request more information from us, or would like to exercise a data privacy right, please contact us at the following: **info@thrivecos.com, 614-545-9247, 842 N. Fourth St., Suite 200, Columbus, OH 43215.**