

PRIVACY POLICY

Revised [●]/2023 and effective [●]/2023

[Download](#) | [Regional Supplements](#) | [Washington State Consumer Health Data Privacy Policy](#)

Stretch Zone Franchising LLC and its subsidiaries and affiliates (“**Stretch Zone**,” “**Franchisor**,” “**we**,” “**us**,” or “**our**”) take your privacy seriously and we know you do too. This Privacy Policy (“**Policy**”) explains how we collect, process, and share Personal Information (defined below), your Rights & Choices, and other important information about how we handle your Personal Information. Certain terms that are capitalized in this Policy are defined and have the meaning applied in our [Terms of Use](#).

You have rights and choices with respect to how we collect and use your Personal Data. Click [here](#) to learn more about your Rights & Choices. Residents of certain US states may have additional rights under applicable law. Click here to review our regional supplements: [California/US States](#); [Washington State Consumer Health Data Privacy Notice](#).

SCOPE OF THIS POLICY

For purposes of this Policy, our “**Services**” refer to:

- Our website located at stretchzone.com or any other website where we post or link to this Policy (“**Website**”); and
- fitness management software solution, mobile application, social media pages, and other online services operated by or on behalf of StretchZone (“**Online Services**”);

This Policy only applies to the data processed by StretchZone as a controller, e.g. data we collect about current or prospective Franchisees, as well as individual users who use our Online Services, Website, or otherwise communicate with Stretch Zone directly (“**Users**”).

All locations, services and websites provided by or on behalf of Stretch Zone Franchises (“Franchisees”), including those linked from stretchzone.com, are independently operated by Franchisees. Stretch Zone does not own or operate any Franchisee locations and is not responsible for the privacy practices of its Franchisees. If you visit any Franchisee website or use the services of any Franchisee, the Franchisee is the “Controller” or “Business” with respect to your Personal Data, and the Franchisee’s privacy policy will apply. Note that we may provide services to our Franchisees as a service provider, and in such cases, the privacy policy of the Franchisee will also apply, and not this Policy.

HOW TO CONTACT US CONTROLLER

The controller of your Personal Information is Stretch Zone Franchising LLC. If you have questions regarding this Policy or about the privacy practices at Stretch Zone, please contact us as follows:

General Inquiries and Data Updates: privacy@stretchzone.com.

Opt-Out of Data Sales or Sharing; Limit uses of Sensitive Personal Information: Visit [Your Privacy Choices](#) or call (855) 275 9177.

Regional Data Rights: Visit [Your Privacy Choices](#), mail to the address below, or call (855) 275 9177.

Direct Marketing Disclosure Inquiries: mail to the address below or email privacy@stretchzone.com

Physical Address: Stretch Zone Franchising LLC

ATTN: Legal Department Stretch Zone Franchising, LLC
6700 North Andrews Ave.
Fort Lauderdale, FL 33309

CHANGES

If there are any changes to this Policy, we will post them on this website. Any changes will be effective as of the date we post them on the website or send the email (whichever is later). Your continued use of our Services constitutes your acknowledgement of any revised Policy.

CATEGORIES AND SOURCES OF PERSONAL INFORMATION

The following describes how we process data relating to identified or identifiable individuals and households (“**Personal Information**”).

Categories of Personal Information We Process

The categories of Personal Information we process may include:

Audio/Visual Data-Recordings and images e.g. audio files and records, photos, videos, voicemails, call recordings, and the like.

Biographical Data-Data relating to professional and employment history, qualifications, and similar biographic information.

Transaction Data-Data about the Services we provide to you and about transactions you make with us.

Contact Data-Identity Data we can use to contact you, such as email and physical addresses, phone numbers, social media or communications platform usernames/handles.

Device Network Data-Browsing history, search history, and information regarding your interaction with a website, application, or advertisement (e.g. the URL of the site from which you came or the one to which you are directed, IP Address, MAC Address, SSIDs, application ID/AdID/IDFA, session navigation history and similar browsing metadata, and other data generated through applications and browsers, including cookies and similar technologies or other device identifiers or persistent identifiers), online user ID, device characteristics (such as browser/OS version), web server logs, application logs, first party cookies, third party cookies, web beacons, clear gifs and pixel tags.

Identity Data-Information such as your name, address, email address, telephone number, gender, date of birth, age and/or age range, account login details, e.g. username and password, avatar, or other account handles/usernames.

Preference Data-Personal Information generated reflecting your preferences, characteristics, predispositions, behavior, demographics, household characteristics, market segments, likes, favorites and other data or analytics.

General Location Data- Non-precise location data, e.g. location information derived from social media tags/posts.

Sensitive Personal Information-Personal Information deemed “sensitive” under California or other laws, such as social security, driver’s license, state identification card, or passport number, account log-in and password, financial account, debit card, or credit card number, precise location data, racial or ethnic origin, religious or philosophical beliefs, etc. We collect the following categories of Sensitive Personal Information:

- **“Payment Data”** Information such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law, and relevant information in connection with a financial transaction;
- **“Precise Location Data”** data from GPS, WiFi signals, or other device technologies to locate you to a precise geolocation;

- **“Health Data”** Information about your health, including certain statistics, range of motion information, and data to confirm whether you are fit for our services (including but not limited to pregnancy and/or other health conditions).
- **“Consumer Health Data”** Information linked or reasonably linkable to a consumer and that identifies the consumer's past, present, or future physical or mental health status as defined under Washington State law. For more information, please review our Consumer Health Data Privacy Policy.

User Content-Unstructured/free-form data that may include any category of Personal Information, e.g. data that you give us in free text fields such as comment boxes, sign-up forms, or community forums.

Sources of Personal Information We Process

We collect Personal Information from various sources, which include:

Data you provide us-We receive Personal Information when you provide them to us, when you complete a transaction via our Services, or when you otherwise use our Services.

Data we collect automatically-We collect Personal Information about or generated by any device used to access our Services.

Service Providers-We receive Personal Information from various service providers who transfer Personal Information to us when you use our Services and they perform services on our behalf.

Franchisees-We receive Personal Information from Franchisees when you direct them to send us data to interact with Stretch Zone, e.g. when you sign up for a mailing list, or the Franchisee inputs data into an Online Services we operate on our own behalf.

Aggregators and advertisers-We receive Personal Information from ad networks, data brokers, Targeted Advertising vendors, market research, and social media companies or similar companies who provide us with additional Personal Information, e.g. Preference Data.

Social media companies-We receive Personal Information from Meta (e.g. Facebook and Instagram) and other social media companies when you interact with that social media company on or in connection with our Services.

Data we create or infer-We, certain partners, social media companies, and third parties operating on our behalf, create and infer Personal Information such as Preference Data or Aggregate Data based on our observations or analysis of other Personal Information processed under this Policy, and we may correlate this data with other data we process about you.

DATA PROCESSING CONTEXTS NOTICE AT COLLECTION

The following describes how we collect and process personal information. Please click the following links for more information regarding [Data Retention](#) and [Regional Data Rights/Disclosures](#).

Customer Records & User Accounts

We process Identity Data, Preference Data, and Contact Data when you use our services, or those of our Franchisees, or create a customer account with us in person or through our Online Services. We process Payment Data if you associate payment information with your account. Additionally, if provided as part of a user profile or collected as part of your use of our services, we process Health Data.

We use this Personal Information to create and maintain your account, to provide the products and services you request, to enable access to and use of your records across Franchisees, to track your progress and preferences with respect to your use of our services, and for our Business Purposes. We may process Identity Data, Preference Data, and Contact Data for Commercial Purposes (which may include data sales/sharing). We do not sell or “share” Payment Data or Health Data or use it for Business Purposes not permitted under applicable law.

Purchases and Transactions

We process Transaction Data, Identity Data, Payment Data, Device/Network Data, Preference Data, and Contact Data when you complete a purchase or sale transaction with Stretch Zone (e.g. for a gift card purchase). Additionally, if provided or indicated in connection with a transaction, we may process Health Data. We do not permanently store your Payment Data, except at your request.

We process this Personal Information as necessary to perform or initiate a transaction with you, process your order, payment, or refund, carry out fulfillment and delivery, document transactions, and for our Business Purposes. We may also process Identity Data, Transaction Data, Preference Data, Contact Data, and Device/Network Data for Commercial Purposes (which may include data sales/sharing). We do not sell or “share” Payment Data or Health Data or use it for Business Purposes not permitted under applicable law.

Third party businesses/controllers, such as our Franchisees, may receive your information as part of a transaction. When you complete a transaction through our Online Services that is fulfilled by a Franchisee, you direct us to disclose the relevant Personal Information to that Franchisee.

Franchisee Applications

We process Identity Data, Contact Data, Government ID Data, Biographical Data, Preference Data, Payment Data, and certain User Content, in connection with your application to be or engagement as a Franchisee owner or representative.

We process this Personal Information as necessary to evaluate, establish, and maintain the Franchisee relationship, and for our Business Purposes. We do not sell or share Personal Information processed in this context. We process Sensitive Personal Information only for Business Purposes permitted under applicable law.

Marketing Communications

We process Device/Network Data, Contact Data, Identity Data, and Preference Data in connection with marketing emails, SMS, push notifications, telemarketing, or similar communications, and when you open or interact with those communications. You may receive marketing communications if you consent and, in some jurisdictions, as a result of account registration or a purchase.

We process this Personal Information to provide you with marketing information or other services offered by third parties which may be of interest to you, information about services, features, surveys, newsletters, offers, promotions, and events, and other news or information about us and our Franchisees. We also process this Personal Information to send you technical notices, updates, security alerts, and support and administrative data sales or “sharing”). Marketing communications may also be personalized as permitted by applicable law. See your Rights & Choices to limit or opt out of this processing.

Website and Online Services

Generally

We process Device/Network Data, Contact Data, Identity Data, General Location Data, and Preference Data when you access our Websites or Online Services. You may also be able to complete purchases, create a User Account, or enroll in marketing communications (described above/below) through our Online Services. Our Online Services may also be used to access or manage information collected in those contexts; please review this Policy for more information on how Personal Information is collected in such contexts.

We use this Personal Information as necessary to operate our Services, such as keeping you logged in, delivering pages, etc., for our Business Purposes, and our other legitimate interests, such as:

- ensuring the security of our websites, mobile applications and other technology systems; and
- analyzing the use of our Services, including navigation patterns, clicks, etc. to help understand and make improvements to the Services.

We may process this Personal Information for our Commercial Purposes (which may include data sales/sharing).

Mobile App

If you use our mobile apps, we may process Identity Data, Device/Network Data, Preference Data, General Location Data, and, with your consent, Precise Location Data.

We process this Personal Information to provide our mobile apps, for our Business Purposes, and our other legitimate interests, such as:

- optimize the display and functionality of the Mobile App on your device;
- determine your location or proximity to the nearest Stretch Zone Franchise location,
- provide directions and contextual information to you;
- deliver features that require the use of Precise Location Data; and
- creating aggregate information about users' location and patterns, which we use to help improve our Services.

We may process this Personal Information for our Commercial Purposes (which may include data sales/sharing). We do not sell or "share" Precise Location Data or process it for Business Purposes not permitted under applicable law. You have the right to limit our use of Precise Location Data by withdrawing consent to or disabling the collection of Precise Location Data.

Cookies and other tracking technologies

We process Identity Data, Device/Network Data, Contact Data, Preference Data, and General Location Data, in connection with our use of cookies, web beacons, tags, scripts, local storage objects (LSOs), and similar technologies on our Website and Online Services. We may collect this data automatically. Cookies are strings of code, on your computer. Web beacons (single pixel gifs), tags and scripts assist us in delivering cookies, counting visits to our website, understanding usage and campaign effectiveness and determining whether an email has been opened or acted upon.

We and authorized third parties may use the above technologies for the following purposes:

- for "essential" purposes necessary for our Online Services to operate (such as maintaining user sessions, CDNs, and the like);
- for "functional" purposes, such as to enable certain features of our Online Services (for example, to allow a customer to maintain an online shopping cart);
- for "analytics" purposes and to improve our Online Services, such as to analyze the traffic to and on our Online Services (for example, we can determine when you visit our website, when you use the Services or log into the Service, your browser type and version, your operating system, and other similar information);
- for "retargeting," Targeted Advertising, or other advertising and marketing purposes, including technologies that process Preference Data or other data so that we can deliver, buy, or target advertisements which are more likely to be of interest to you; and
- for "social media" e.g. via third-party social media cookies, or when you share information using a social media sharing button or "like" button on our Services or you link your account or engage with our content on or through a social networking website including Meta (Facebook and Instagram), LinkedIn, or TikTok.

We may also process this Personal Information for our Business Purposes and Commercial Purposes (which may include data sales/sharing). See your Rights & Choices for information regarding opt-out rights for cookies and similar technologies. You may turn off cookies that have been placed on your computer by following the instructions on your browser or through our [Cookie Management Platform](#). However, if you block our cookies, it may be more difficult (and maybe even impossible) to use the Services.

Third parties may view, edit, or set their own cookies or place web beacons on our websites. We, or third party providers, may be able to use these technologies to identify you across platforms, devices, sites, and services. Third parties may engage in Targeted Advertising using this data. Third parties have their own privacy policies and their processing is not subject to this Policy.

Social Media Features and Widgets

We process Identity Data, Device/Network Data, Preference Data, and Contact Data when you interact with our Services through social media features, such as the Facebook “Like” button, the “Share this” button, or interactive mini-programs that run on our website.

We process this Personal Information for our Business Purposes, and Commercial Purposes (which may include data sales/sharing).

Social Media Features and Widgets are either hosted by a third party or hosted directly by Stretch Zone. Your interactions with third-party features are governed by the privacy policy of the company providing it.

Posts may be public, or reposted on our Services. Content you provide may be publicly-available when you post it on our Services, or in some cases, if you reference, engage, or tag our official social media accounts or communications platforms.

Public Forum Posts and User Testimonials

We process Identity Data, Preference Data, Contact Data, and User Content you post on publicly accessible blogs or community forums. We also process Identity Data, Contact Data, and User Content if you submit a User testimonials on our website, or if you interact with or identify us on social media or communication platforms (e.g. if you post User Content that engages with or tags our official accounts.)

We process this Personal Information for our Business Purposes, and Commercial Purposes (which may include data sales/sharing).

Posts may be public, or reposted on our Services. Content you provide may be publicly-available when you post it on public-facing portions of our Services.

To request removal of your Personal Information from a community forum or User testimonial, please contact us at info@StretchZone.com.

Communications with Us

We collect and process Identity Data, Contact Data, and User Content when you send an email or other communication to us, including sending Stretch Zone support requests. If you call us via phone, we may collect Audio/Visual data from the call recording.

We process this Personal Information to process your inquiries, respond to your requests, improve our Services, and for our Business Purposes. If you consent or if permitted by law, we may use Identity Data and Contact Data to send you marketing communications and for our Commercial Purposes (which may include data sales/sharing).

Contests and promotions

We may collect and process Identity Data, Preference Data, certain Contact Data, and User Content when you enter a contest/sweepstakes or take part in a promotion.

We process this Personal Information as necessary to provide the contest/promotion, notify you if you have won, or to process delivery of a prize, for our Business Purposes, and other legitimate interests, such as:

- verifying your identity for authentication, anti-fraud, and security purposes (in which case we may process Government ID Data to complete verification);
- to improve our Services and to create a personalized user experience; and
- to contact you about relevant products or services, and in connection with marketing communications and Targeted Advertising.

We may also process Identity Data, Contact Data, and User Content information for our Commercial Purposes (which may include data sales/sharing).

Some programs and offers are operated/controlled by our Franchisees or partners. We may receive this data from third parties to the extent allowed by the applicable partner; otherwise, this Policy will not apply to data processed by third parties.

Winners' Personal Information may be public. If you win a contest/sweepstakes, we may publicly post some of your data. We do not post Personal Information without consent where required by law. See any program agreement(s) for additional details and terms.

PROCESSING PURPOSES

Business Purposes

We and our Service Providers process Personal Information we hold for numerous business purposes, depending on the context of collection, your Rights & Choices, and our rights under applicable law. We generally process Personal Information for the following "Business Purposes."

Service Delivery

We process Personal Information as necessary to provide our Services and the products and services you purchase or request. For example, we process Personal Information to provide and operate our Services, enable you to access and use our Services, process and complete transactions and send you related information, including purchase confirmations and invoices, communicate with you, including responding to your comments, questions, and requests, providing customer service and support; or bill and collect money owed to us.

Internal Processing and Service Improvement

Provide, operate. We may use any Personal Information we process through our Services as necessary in connection with our legitimate interests in maintaining, analyzing, improving, and promoting our Services, understanding how our Services are used or function, for customer service purposes, for internal research, technical or feature development, to track service use, QA and debugging, audits, and similar purposes.

Security and Incident Detection

We may process Personal Information in connection with our legitimate interest in ensuring that our Services are secure, to investigate and prevent fraudulent transactions, unauthorized access to our Services, and other illegal activities, verify or authenticate users/individuals, and ensure the safety of our guests. Similarly, we process Personal Information on our Services as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal Information in connection with our information security activities.

Personalization

We process certain Personal Information as necessary in connection with our legitimate interest in personalizing and tailoring our Services to our Users' needs. For example, aspects of our Online Services may change so they are more relevant to you. We may personalize based on Preference Data we derive from your current interactions with the Service or obtain from third parties. We may also personalize based on your user profile, where permitted by law, e.g. by displaying your name and other appearance or display preferences, to display content that you have interacted with in the past, or to display content that we think may be of interest to you based on your interactions with our Online Services and other content.

Aggregated Data

We aggregate Personal Information related to the use of the Services and publish this information, segmented by User, geography and other metrics, to provide qualitative insights on customer support metrics and other relevant insights ("**Aggregated Data**"). Aggregated Data that does not contain Personal Information is not subject to this Policy.

Analytics

We process Personal Information and Aggregated Data to monitor and analyze trends, usage, and activities in connection with our Services. We develop analytics information when you use our Online Services, our Website, and Services to help us improve them. The analytics we develop may include elements of Personal Information related to the function you are performing.

Compliance, Health, Safety, Public Interest

We may also process Personal Information as necessary to meet legal requirements, like complying with court orders and valid subpoenas; to prosecute and defend court, arbitration, or similar proceedings; as may be required to meet national security or law enforcement requirements or prevent illegal activity; or where you exercise your rights under data protection law. We may also process data to protect the vital interests of individuals, or on certain public interest grounds, each to the extent required or permitted under applicable law. Please see the Disclosure/Sharing of Personal Information section for more information about how we disclose Personal Information in extraordinary circumstances.

Commercial Purposes

We and certain third parties process Personal Information to further our commercial or economic interests ("Commercial Purposes,") depending on the context of collection and your [Rights & Choices](#).

Please Note We may require your consent, or we may not engage in processing of Personal Information for Commercial Purposes in some jurisdictions. See the "[Regional Supplement](#)" section below for more information.

Personalized Marketing Communications

We may personalize Marketing Communications based on the Personal Information we collect about you. If consent to Targeted Advertising is required by law, we will seek your consent.

Targeted Advertising

In some jurisdictions, Stretch Zone and certain third parties operating on or through our Services, may engage in advertising targeted to your interests based on Personal Information that we or those third parties obtain or infer from your activities across non-affiliated websites, applications, or services in order to predict your preferences or interests ("**Targeted Advertising**"). This form of advertising includes various parties and service providers, including third party data controllers, engaged in the processing of Personal Information in connection with advertising. These parties may be able to identify you across sites, devices, and over time.

The parties that control the processing of Personal Information for Targeted Advertising purposes may create or leverage information derived from Personalization and Marketing Communications. In some cases, these parties may also develop and assess aspects of Personal Information about you to determine whether you are a type of person a company wants to advertise to, and determine whether and how ads you see are effective. These third parties may augment your profile with demographic and other Preference Information, and may track whether you view, interact with, or how often you have seen an ad, or whether you purchased advertised goods or services.

We generally use Targeted Advertising for the purpose of marketing our Services and third-party goods and services, and to send marketing communications, including by creating custom marketing audiences on third-party websites or social media platforms.

Data Sales

We may engage in "sales" of data as defined by applicable law. For example, we may "sell" certain Personal Information when we engage in marketing campaigns with or on behalf of sponsors, conduct Targeted Advertising, or we may sell or grant access to Personal Information to our marketing partners, artists, promoters, and other advertisers in relation to Targeted Advertising, joint promotions, and other marketing initiatives. See the [California Rights & Disclosures](#) section for a list of categories of Personal Information sold or shared.

DISCLOSURE/SHARING OF PERSONAL INFORMATION

We may share Personal Information with the following categories of third-party recipients and for the following reasons:

Franchisees- We will share your Personal Information with the operators of Franchisee stores in order to streamline certain business operations, and in support of our [Business Purposes](#), and [Commercial Purposes](#).

Service Providers- We share Personal Information, with our third-party service providers (such as merchant service providers, credit card companies, managed hosting providers, and technology partners) to provide the necessary hardware, software, networking, storage, and other services that we use to operate our Services and maintain a high quality user experience. We and these third party service providers may use the Personal Information in connection with our general business operations, product/service fulfillment and improvements, to enable certain features, and in connection with our (or our Service Providers') [Business Purposes](#).

Sponsors, Advertisers, and Social Media Platforms- We may share certain Personal Information with social media platforms, advertisers, ad exchanges, data management platforms, or sponsors in support of our [Business Purposes](#) and [Commercial Purposes](#). We may allow these third parties to operate through our Services.

Public Disclosure- If you provide a review or testimonial, use any social media plugin, API, or other similar feature, use an event hashtag or similar link, or otherwise interact with us or our Services publically or via social media, we may make your post available on our Services or to the general public. We may share, rebroadcast, or redisplay Personal Information or other information in the post to the extent permitted by the relevant social media service.

Data Aggregators- We may share Personal Information with data aggregators in support of our [Commercial Purposes](#) and in connection with [Data Sales](#). These disclosures/sales can help better personalize our Services, the services of third parties, and help ensure that you see advertisements that are more relevant to your interests.

Business Transactions- Stretch Zone may assign or transfer this Policy, and your Personal Information (subject to confidentiality restrictions), to any person or entity that acquires all of our or substantially all of our business, stock or assets of, or with whom we merge, are acquired, liquidated, or otherwise sold.

Lawful Recipients- In limited circumstances, we may, without notice or your consent, access and disclose your Personal Information any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use, in the vital interests of us or any person (such as where we reasonably believe the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety) or in such other circumstances as may be required or permitted by law. These disclosures may be made to governments that do not ensure the same degree of protection of your Personal Information as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Information to such parties.

Other Services

-You may choose to make use of third party products, applications, services, software, networks, systems, directories, websites, databases and information which our Service links to, or which you may connect to or enable in conjunction with Stretch Zone Services, including without limitation, services which may be integrated directly into your Stretch Zone account ("Other Services"). When access is granted, certain Personal Information associated with your account may be shared with the third party. Stretch Zone does not control the policies or procedures of these Other Services, even though the Other Services may be available through our Service. This Policy does not cover the collection or use of Personal Information, by Other Services, and we urge you to consider the privacy policies governing these Other Services.

INTERNATIONAL TRANSFERS OF YOUR PERSONAL INFORMATION

Stretch Zone operations are located only in the United States. If you are located outside the United States, we may transfer or process your Personal Information in the United States and other jurisdictions where Stretch

Zone or our service providers operate. Where required by local law, we ensure your data remains protected in connection with any international transfers.

YOUR RIGHTS & CHOICES

You may have certain rights and choices regarding the Personal Information we process. Please note, these rights may vary based on the country or state where you reside, and our obligations under applicable law. See the following sections for more information regarding your rights/choices in specific regions:

- [US States/California](#)
- [Washington State Consumer Health Data Privacy Policy](#)

Your Rights

You may have certain rights and choices regarding the Personal Information we process. See the [Regional Supplement](#) section below for rights available to you in your jurisdiction. To submit a request, contact our Data Privacy Team. We verify your identity in connection with most requests, as described below.

Verification of Rights Requests

If you submit a request, we typically must verify your identity to ensure that you have the right to make that request, reduce fraud, and to ensure the security of Personal Information. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.

We may require that you match personal information we have on file in order to adequately verify your identity. If you have an account, we may require that you log into the account to submit the request as part of the verification process. We may not grant access to certain Personal Information to you if prohibited by law.

Your Choices

Marketing Communications

You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email (for email), by responding with "OPT-OUT," STOP, or other supported unsubscribe message (for SMS), by adjusting the push message settings for our mobile apps using your device operating system (for push notifications), or for other communications, by contacting us using the information below. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Withdrawing Your Consent/Opt-Out

You may withdraw any consent you have provided at any time. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out. If you would like to opt-out from receiving marketing-based communications from Stretch Zone Franchisee, or a third-party vendor to whom Stretch Zone has provided your Personal Information, you may do so by contacting your local Stretch Zone Franchisee.

Precise Location Data

You may control or limit Precise Location Data that we collect through our Services by changing your preferences in your device's location services preferences menu, or through your choices regarding the use of Bluetooth, WiFi, and other network interfaces you may use to interact with our Services. Note, we may collect General Location Data even if you opt out of the collection of Precise Location Data.

Cookies, Similar Technologies, and Targeted Advertising

General- If you do not want information collected through the use of cookies, you can manage/deny cookies (and certain technologies) using your browser's settings menu or our Manage Cookies page. You may need to opt out of third-party services directly via the third party. For example, to opt-out of Google's analytic and marketing services, visit [Google Analytics Terms of Use](#), the [Google Policy](#), or [Google Analytics Opt-out](#).

Targeted Advertising- You may opt out or withdraw your consent to Targeted Advertising by visiting [Your Privacy Choices](#). In some cases, you may be able to opt-out by submitting requests to third party partners, including for the vendors listed below:

- [Google Ad Settings](#)
- [Facebook Custom Audience Pixel](#)
- [Twitter Audience Pixel](#)
- [Digital Advertising Alliance's opt-out](#)
- [Network Advertising Initiative opt-out](#)

Global Privacy Control (GPC)- Our Online Services may support certain automated opt-out controls, such as the [Global Privacy Control](#) ("GPC"). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of the sale/sharing of Personal Information. To activate GPC, users must enable a setting or use an extension in the user's browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

Please note: We may not be able to link GPC requests to your Personal Information in our systems, and as a result, some sales/sharing of your Personal Information may occur even if GPC is active. See the [Regional Supplement](#) section below for more information regarding other opt-out rights.

Do-Not-Track - Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioral advertising services) that you do not wish such operators to track certain of your online activities over time and/or across different websites. We do not support Do Not Track requests at this time.

DATA SECURITY

We implement and maintain commercially reasonable security measures to secure your Personal Information from unauthorized processing. While we endeavor to protect our Services and your Personal Information from unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

DATA RETENTION

We may retain Personal Information for as long as is necessary to provide support and support-related reporting, to comply with our legal obligations, meet regulatory requirements, resolve disputes between Users or third parties, prevent fraud and abuse, or enforce this Policy and our Terms of Use. We may retain Personal Information if requested by law enforcement. Generally, we retain Personal Information for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

CHILDREN'S ONLINE PROTECTION PRIVACY ACT

Stretch Zone does not knowingly collect any Personal Information from children under the age of 13. If you are under the age of 13, please do not submit any Personal Information through the Services. We encourage parents and legal guardians to monitor their children's internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through our Services without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Information to us through our Online Services or our Services, please contact us, and we will use commercially reasonable efforts to delete that Personal Information. Franchisees are responsible for establishing policies for and compliance with applicable laws for the collection of Personal Information in connection with our Services.

REGIONAL SUPPLEMENTS

US States/California

US State & California Privacy Rights & Choices

Under the California Consumer Privacy Act ("**CCPA**") and other state privacy laws, residents of certain US states may have the following rights, subject to regional requirements, exceptions, and limitations.

Confirm- Right to confirm whether we process your Personal Information.

Access/Know- Right to request a copy of the following related to the information we collect about you:

- the categories of Personal Information we have collected about you, sold/shared, or disclosed for a commercial purpose;
- the categories of sources from which your Personal Information was collected;
- the business or commercial purpose for collecting or selling/sharing your Personal Information;
- the categories of third parties with whom we have sold/shared your Personal Information; and
- the specific pieces of Personal Information we have collected about you.

Portability- Right to request that we provide certain Personal Information in a common, portable format.

Deletion- Right to request that we delete any Personal Information we hold about you.

Correction- Right to correct certain Personal Information that we hold about you.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling)- Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal Information.
- If we engage in Targeted Advertising (aka "sharing" of Personal Information or cross-context behavioral advertising,) you may opt-out of such processing.
- If we engage in certain forms of "profiling" (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

Opt-out or Limit Use and Disclosure of Sensitive Personal Information- right to opt-out of the processing of certain Sensitive Data, or request that we limit certain uses of Sensitive Personal Information. This right does not apply in cases where we only use Sensitive Personal Information where necessary, or for certain business purposes authorized by applicable law.

Opt-in/Opt-out of Sale/Sharing of Minors’ Personal Information- To the extent we have actual knowledge that we collect or maintain personal information of a minor under age 16 in California, those minors must opt in to any sales/sharing of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales/sharing of personal information. All minors have the right to opt-out later at any time.

Non-Discrimination- California residents have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA. We do not discriminate against you based on you exercising any of the above rights.

List of Direct Marketers- California residents may request certain information about our disclosure of information about you to third parties for their own direct marketing purposes during the preceding calendar year. This request is free and may be made once a year by contacting us as below.

Submission of Requests; Appeals

If you wish to exercise any of these rights, please submit your request via one of the following methods (please our review [verification requirements](#) section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@stretchzone.com. We will respond to any request to appeal within the period required by law.

<p>Access/Know, Processing, Deletion, and Correction</p>	<p>Confirm Portability,</p> <ul style="list-style-type: none"> You may visit our Your Privacy Choices You may call us at: (855) 275 9177. You will be directed to leave a voicemail where you will provide your email address, phone number and address we have on file, along with your request. You may send mail to our Contact Us address above with your email address, phone number and address we have on file, along with your request.
<p>Opt-Out of Sales, Sharing, Targeted Advertising or Profiling</p> <p>Opt-out/Limit Use and Disclosure of Sensitive Personal Information</p> <p>Opt-in/Opt-out of Sale/Sharing of Minors’ Personal Information</p>	<ul style="list-style-type: none"> You may visit Your Privacy Choices You may call us at: (855) 275 9177. You will be directed to leave a voicemail where you will provide your email address, phone number or address, along with your request. You may send mail to our Contact Us address above with your email address, phone number or address on file, along with your request. You may enable Global Privacy Control (GPC) to opt out of Targeted Advertising/sharing. Online Services supporting GPC (or similar standards) will treat the request as a request to opt-out of Targeted Advertising/sharing on the device where the GPC setting is active. To limit the use and disclosure of Precise Location Data, update your preferences for location data using your device’s settings menu, or disable WiFi, Bluetooth, or other interfaces you use to interact with our Services.

Categories of Personal Information Disclosed for Business Purposes

For purposes of the CCPA, we have disclosed to Service Providers for “Business Purposes” in the preceding 12 months the following categories of Personal Information, to the following categories of recipients:

Category of Personal Information	Category of Recipients
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Audio/Visual Data Contact Data Identity Data General Location Data User Content	Franchisees; Service Providers; Sponsors, Advertisers, and Social Media Platforms; Public Disclosure; Data Aggregators; Business Transactions; Lawful Recipients; Other Services
Device/Network Data Preference Data Transaction Data Biographical Data	Franchisees; Service Providers; Sponsors, Advertisers, and Social Media Platforms; Data Aggregators; Business Transactions; Lawful Recipients; Other Services
Payment Data; Precise Location Data; Health Data;	Franchisees; Service Providers

Categories of Personal Information Sold, Shared, or Disclosed for Commercial Purposes

For purposes of the CCPA, we have “sold” or “shared” in the preceding 12 months the following categories of Personal Information in the, to the following categories of recipients:

Category of Personal Information	Category of Recipients
Transaction Data	Service Providers; Sponsors, Advertisers, and Social Media Platforms; Data Aggregators; Business Transactions
Contact Data	
Device/Network Data	
Identity Data	
Preference Data	
General Location Data	
User Content	

Categories of Sensitive Personal Information Used or Disclosed

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Information: Health Data; Payment Data; Precise Location Data. However, we do not sell or share Sensitive Personal Information, or use it for purposes other than those listed in CCPA section 7027(m).

WASHINGTON STATE CONSUMER HEALTH DATA PRIVACY POLICY

Categories of Consumer Health Data We Collect

We collect the following categories of personal information linked or reasonably linkable to a consumer and that identifies the consumer's past, present, or future physical or mental health status as defined under Washington State law (“**Consumer Health Data**”), for the following purposes:

Categories of Consumer Health Data	Purpose for Collection	How data will be used
<p>Individual health conditions or diagnosis, such as range-of-motion or presence of physical conditions (including pregnancy)</p> <p>Social, psychological, behavioral, and medical interventions, such as session progress</p> <p>Bodily functions, vital signs, symptoms, or related measurements that may be required to receive our services</p> <p>Diagnoses or diagnostic testing, treatment, or medication, including but not limited to COVID-19 testing or first-aid administration</p>	<p>User Accounts</p> <p>Purchases and Transactions</p>	<ul style="list-style-type: none"> • Help clients track their progress • Confirm the client is fit for our service • Create and maintain your account • Provide the products and services you request • Perform or initiate a transaction with you • Process your order, payment, or refund • Carry out fulfillment and delivery • Document transactions • Business Purposes
<p>Biometric data, including imagery of the face and voice recordings</p>	<p>[TBD]</p>	<p>[Do you collect any photos?]</p> <p>[Do you allow people to leave voicemails?]</p>
<p>Data that identifies a consumer seeking “health care services” as defined under Washington State law, also referred to as “Identity Data”</p>	<p>User Accounts</p> <p>Purchases and Transactions</p> <p>Website and Online Services</p> <p>Public Forum Posts and User Testimonials</p> <p>Communications with Us</p>	<ul style="list-style-type: none"> • Create and maintain your account • Provide the products and services you request • Perform or initiate a transaction with you • Process your order, payment, or refund • Carry out fulfillment and delivery • Document transactions • To operate our Services • Ensure the security of our websites, mobile applications and other technology systems • Analyze the use of our Services, including navigation patterns, clicks, etc. to help understand and make improvements to the Services. • Process your inquiries • Respond to your requests • Improve our Services • Business Purposes • Commercial Purposes

Sources of Consumer Health Data We Collect

We collect Consumer Health Data from various sources, which include: [Data you provide us](#); [Data we collect automatically](#); [Service Providers](#); [Franchisees](#); [Aggregators and advertisers](#); [Social media companies](#); [Data we create or infer](#)

Sharing of Consumer Health Data

Categories of Consumer Health Data We Share

We may share the following category of Consumer Health Data with third parties and specific affiliates:

- Individual health conditions or diagnosis;
- Social, psychological, behavioral, and medical interventions;
- Bodily functions, vital signs, symptoms, or related measurements ;
- Diagnoses or diagnostic testing, treatment, or medication; and
- Data that identifies a consumer seeking “health care services” as defined under Washington State law, also referred to as “[Identity Data](#).”

Categories of Third Parties with Whom We Share

We may share Consumer Health Data with the following categories of third-party recipients: [Franchisees](#); [Service Providers](#); [Sponsors, Advertisers, and Social Media Platforms](#); [Data Aggregators](#); [Lawful Recipients](#).

Specific Affiliates with Whom We Share

We may share data with our Affiliates. [no need to list them now]

My Health My Data Rights

Your Rights

Under the Washington State My Health My Data Act, Washington State residents and natural persons whose Consumer Health Data is collected in Washington may have the following rights, subject to verification, exceptions, and limitations:

Right to Delete - You have the right to request deletion of the Consumer Health Data held by us and our affiliates, processors, contractors, and other third parties.

Right to Withdraw Your Consent/Opt-Out - You may withdraw any consent you have provided at any time regarding our collection and sharing of Consumer Health Data. The consequence of you withdrawing consent might be that we cannot perform certain services for you, such as location-based services, personalizing or making relevant certain types of advertising, or other services conditioned on your consent or choice not to opt-out.**Right to Non-Discrimination** - You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the My Health My Data Act.

How to Exercise Your Rights

You may exercise your rights under Washington State law as follows (please review our verification requirements section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@stretchzone.com. We will respond to any request to appeal within the period required by law.

Delete	<ul style="list-style-type: none">• Contact us via email to our privacy team at privacy@stretchzone.com• You may call us at: (855) 275 9177. You will be directed to leave a voicemail where you will provide your email address, phone number and address we have on file, along with your request.• You may send mail to our Contact Us address above with your email address, phone number and address we have on file, along with your request.
Withdrawing Your Consent/Opt-Out	<ul style="list-style-type: none">• Contact us via email to our privacy team at privacy@stretchzone.com• You may call us at: (855) 275 9177. You will be directed to leave a voicemail where you will provide your email address, phone number and address we have on file, along with your request.

	<ul style="list-style-type: none">• You may send mail to our Contact Us address above with your email address, phone number and address we have on file, along with your request.• In some cases, you may be able to withdraw your consent to Targeted Advertising by submitting requests to third party partners, including for the vendors listed below:<ul style="list-style-type: none">○ Google Ads○ Facebook Custom Audience Pixel○ Twitter Audience Pixel○ Digital Advertising Alliance's opt-out○ Network Advertising Initiative opt-out
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