



CROSSFIT URBAN EDGE PRIVACY POLICY

Version Dated: 26 August 2021

General information

"CFUE", "we" "us" and "our" refers to Active360 Pte. Ltd. trading as CrossFit Urban Edge as the controllers of your personal data, except otherwise stated in this Privacy Policy. Active360 Pte Ltd is a private company limited by shares, incorporated under the laws of Singapore, having its registered office at 12 Bukit Pasoh Road, 089826, registered with the Accounting and Corporate Regulatory Authority (ACRA) of Singapore under registration number 201611733M. Its contact email address is info@crossfiturbanedge.com. In issues relating to your account, to withdraw your consent, to ask general questions or to lodge a complaint, please contact info@crossfiturbanedge.com.

This privacy policy ("Privacy Policy") explains our policies and practices regarding how we collect, use, and disclose the personal data that we collect through operating our fitness studio or during our events, and in providing our services to you. Please read this Privacy Policy carefully as it provides important information about your personal data. Our Privacy Policy may be changed from time to time to be revised in accordance with applicable legal or regulatory changes. Whenever our Privacy Policy is updated, we will also update the version date at the beginning of the Privacy Policy with the most updated version. If there are any material changes to the Privacy Policy, we will specify these changes at the beginning of the Privacy Policy and/or publish the changes on our Website.

Personal data is information, whether true or not, about an individual who is or can be identified from that data, or from that data and other information to which the organisation has or is likely to have access to. E.g. it may include an individual's name, address and gender.

We may collect personal data either directly from you (e.g. when you purchase a service for our fitness studio) or indirectly (e.g. from your electronic devices that interact with our website, electronic forms or mobile applications, including but not limited to, www.crossfiturbanedge.com ("Website") and www.mindbodyonline.com ("Mindbody")).

Please see below when you may provide us with information:

- The creation of an account online;
- During the purchase of services on our Website or on Mindbody or in our fitness studio;
- During your visit or if contact our fitness studio;
- If you participate in one of our events;

Depending on what you provide us with, such information may include but is not limited to:

- Your identity (including your first name, last name, gender, image, nationality);
- Your contact details (including your postal address(es), email address(es), phone number(s));
- Your personal status (including your title);
- Your purchases (including purchase history, order details);
- Your preferences (including your size);
- Certain payment information (including billing information, payment type or method, charge or credit card number);
- Necessary health information including but not limited to vaccination statuses;
- Other information you may provide by filling forms or by contacting us (including your feedbacks, or other communications with us which may include health data relating to possible adverse reactions to our cosmetic products).

We will inform you when your information is required in order to process your request, to respond to your queries or to provide you with our services. If you do not provide this information, then it may delay or prevent us from processing your request, responding to your query or providing services to you.



We are obliged to ensure that the personal data relating to you is accurate at all times and therefore request that you notify us should your information requires updating. Please also confirm whether your information requires updating should we ask you.

Please provide the personal data requested or necessary for your query, with the exception of any sensitive information related to racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life or sexual orientation.

As mentioned, information may also be collected indirectly, such as your IP address or other browsing information (including browser, operating system, device model), through cookies or similar technologies placed on your device. Some cookies are required for the proper functioning of our Website and/or Mindbody and other are used for analytics purposes which help us to provide you with more personalized and customized services and a better digital experience.

Information may also be collected about you from third parties, e.g. a spouse who contacts us on your behalf or from your friends who provide us with your information in order to invite you to events or our services that you may be interested in. If you provide personal data to us about someone else, you must ensure that you are entitled to disclose that information to us. You acknowledge and agree that we may collect, use and disclose such information for the purposes described in our Privacy Policy. You must ensure and warrant that the person concerned is aware of our Privacy Policy, including that (i) their personal data has been or will be disclosed to us and that (ii) their personal data will be collected, used, disclosed or otherwise processed by us in the manner and for the purposes as set out in this Privacy Policy. You warrant that they have provided any relevant consents required under law in order for you to provide their information to us to be processed in accordance with this Privacy Policy.

We remind you that we do not collect, directly or indirectly, personal data from persons under the age of 18, subject to any applicable laws.

Purpose and use

We rely on your consent to process the personal data you provide to us for this purpose. Therefore, if you no longer wish to receive such information, you can withdraw your consent at any time. Grounds for collection, use and/or disclosure:

- your prior consent has been obtained. Note: you have a right to withdraw your consent at any time;
- the processing is necessary in connection with any contract between CFUE and you (e.g. when you make a purchase);
- if applicable, we have a legitimate interest in carrying out the processing and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms (e.g. to prevent payment fraud);
- to process your personal data to comply with applicable laws and regulations.

Subject to the circumstances, purposes for collection, use and/or disclosure:

- provide you with the services you requested and all ancillary actions related thereto;
- conduct checks to identify you and verify your identity;
- process, authenticate and complete your orders and payments;
- send you Promotional Communications concerning offers, services, products or events - with your prior express consent (see section "Promotional Communications");
- manage account requests including refunds;
- process and respond to your queries and any communications received by you;
- manage complaints and litigation, whether actual or threatened;
- manage the events you registered and/or participated in;
- to detect, prevent and fight against fraudulent or illegal activity, including to protect your transactions from payment fraud;
- protect you, our employees and other individuals in our fitness studio as well as our property;
- conduct IT development and data quality management services (such as standardisation and deduplication of data);
- host and carry out marketing and business studies and marketing campaigns;
- improve our products and services;

- facilitate sales, mergers or reorganisations of CFUE;
- establish, exercise or defend our legal rights or legitimate interests (e.g. in civil or criminal legal proceedings);
- provide information to any court, legal or regulatory bodies anywhere in the world when legally required; and
- ensure compliance with any and all applicable laws, rules, regulations, regulatory policies, guidelines, industry codes, judgments, orders, requests, notices or directions issued by any court, legal or regulatory bodies, anywhere in the world, including but not limited to rules and regulations relating to Covid-19 or other health advisories from the Ministry of Health and SportsSG, anti-money laundering and countering the financing of terrorism and the carrying out of audit checks, surveillance and investigations.

We may ask you to confirm or update your preferences regarding Promotional Communications if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Disclosure

We may disclose your personal data only to the parties indicated below and for the following reasons:

- CFUE employees and stakeholders that need to have access to your personal data and are authorized to process them in order to achieve the aforementioned purposes and who are committed to confidentiality.
- Third-party providers acting on behalf of CFUE and/or authorised by CFUE. All such processing is based on our prior instructions set out in a binding contract that is compliant with the requirements of applicable law. Such disclosures are made for different purposes including:
 - IT development and support;
 - Hosting and carrying out marketing and business studies and marketing campaigns;
 - Verifying your information, authenticating payments and processing orders and payments, to third parties that provide credit reporting, payment or order fulfilment services;
 - Data quality management services

We will use our best endeavours to ensure that such providers are committed to confidentiality and are not permitted to use your personal data for any other purposes. To the best of our ability, we will also require them to use appropriate security measures to protect your personal data. Part of those service providers may be located outside of your country, notably in Australia, and will use our best endeavours to ensure any international transfers of data are done lawfully.

- To legal or governmental authorities in order to comply with any binding requirements of an applicable law, or for the purposes of responding to legal proceedings or other lawful requests to disclose your personal data to authorities or third parties.
- To defend our legitimate interests (for example, in civil or criminal legal proceedings). E.g. we may disclose such personal data as necessary to identify, contact or bring legal action against a person or entity who may be violating our Terms and Conditions of Sale (available on our Website).
- In the event that CFUE, or all or part of its or their assets, are acquired by a third party, your personal data may be included in the transferred assets.

Your rights

Subject to and in accordance with the applicable data protection laws at all times, you can, at any time, request access, rectification, erasure, restrict processing and portability of your personal data or restrict and object to the processing of your personal data. Any requests relating to your personal data will require us to verify your identity in order to process your request and protect you against fraudulent request from third parties.

Where the collection, use, processing and/or disclosure of your personal data is based on your consent, you may at any time decide to withdraw it, including your consent to receive Promotional Communications. If your consent is withdrawn, it won't affect any collection, use, processing and/or disclosure of your personal data based on legal bases other than consent. We will take all reasonable steps to meet your request at the earliest possible opportunity, subject to applicable laws.



You also have the right to lodge a complaint with the Singapore data protection authority in case of alleged infringement of the data protection rules applicable to you.

To exercise any of those rights, please contact us at the email mentioned above.

Security

All your personal data is strictly confidential and will only be accessible, on a need-to-know basis, to duly authorized personnel of CFUE and third providers acting on our behalf with appropriate technical and organizational security safeguards. We limit those who access your personal data to those who have a genuine business need to access it. Those who do access your data are subject to a duty of confidentiality towards CFUE.

We also require those parties to whom we transfer your personal data to comply with the same. However, unfortunately, the transmission of information via the internet is not completely secure. So, we cannot ensure the security of your personal data transmitted by you to us via the internet. Any such transmission is at your own risk and you acknowledge and agree that we shall not be responsible for any unauthorized use, distribution, damage or destruction of your Information, except to the extent we are required to accept such responsibility under the law.

Retention period

Subject at all times, to applicable laws, your personal data will be processed for the period necessary for the purposes for which it was collected, to comply with legal and regulatory obligations and for the duration of any period necessary to establish, exercise or defend any legal rights. We have specifically considered the amount, nature and sensitivity of your personal data, the reasons for which we collected your personal data, the service to be provided by us together with the applicable legal requirements. E.g. (a) for existing customers, your data is stored for the duration of our commercial relationship and for up to seven years and then deleted or archived to comply with legal retention obligations, (b) for potential customers, your data is stored for a period of up to three (3) years from the date of your last interaction with us.