

## PRIVACY POLICY

This website that you are visiting, [www.greatlifeutah.com](http://www.greatlifeutah.com) (the "Website"), is owned by GreatLIFE Utah Fitness (the "Company").

Company and its subsidiary companies respect the privacy rights of our online visitors and recognize the importance of protecting the information collected from you. We have adopted a corporate wide Online Privacy Policy that guides how we collect, store and use the information you provide online. Please note that this policy applies only to sites maintained by Company and its subsidiaries, and not to web sites maintained by other companies or organizations to which we link.

If you have questions or concerns regarding this statement, you should first contact Company at the email address or postal address specified on Website.

### INFORMATION COLLECTION AND USE

GREATLIFE UTAH collects various categories of your personal information. Our primary goals in collecting this information is to provide you with the product and services made available through our web site, including, but not limited, our services, to communicate with you, and to manage your registered user account, if you have one. Specifically, GREATLIFE UTAH collects these categories of information for the following purposes:

1. **Demographics.** GREATLIFE UTAH collects your name, address, phone number, email address, and billing information for the purpose of providing use of the gym facilities. In addition, we may use your contact information to market to you, and provide you with information about, our products and services, including but not limited to our services;
2. **Body Measurements:** Your height, weight, and body fat for purposes of providing personal training services;
3. **Gym Usage.** We track your gym usage to track max capacity, market research for providing future services, and other internal marketing purposes.
4. **Log and Geolocation Data:** When you visit the Site, our servers automatically record information that your browser sends whenever you visit a website as Log Data. This Log Data may include information such as your IP address, mobile device location, browser type or the domain from which you are visiting, browser location, the websites you visit, the search terms you use, and any advertisements on which you click. For most users accessing the Internet from an Internet service provider the IP address will be different every time you log on. We use Log Data to monitor the use of the Site and of our Service, and for the Site's technical administration. We do not associate your IP address with any other personally identifiable information to identify you personally, except in case of violation of the Terms of Service.
5. **Cookies:** We use cookies and other technologies to passively collect demographic information, personalize your experience on our site and monitor advertisements and other activities. Cookies are small files downloaded to your

computer to track movements within web sites. We may link cookie information to personal information. Cookies link to information regarding what items you have selected for purchase at our store or pages you have viewed. This information is used to keep track of your shopping cart and make sure you don't see the same ad repeatedly. Also, we use cookies to deliver content specific to your interest and to monitor website usage. Some of our sites use an outside ad company to display ads. These ads may contain cookies. Our ad companies collect cookies received with banner ads, and Company does not have access to this information. Most browsers are automatically set to accept cookies whenever you visit a website. You can disable cookies or set your browser to alert you when cookies are being sent. However some areas of our sites will not function properly if you do so. Please note that this privacy policy covers the use of cookies by Company only and does not cover the use of cookies by any advertisers.

6. **Other Technologies:** Other technologies used include clear GIFs and IP address logging. Clear GIFs also known as web bugs, beacons or tags, are small graphic images placed on a web page, web-based document, or in an e-mail message. Clear GIFs are invisible to the user because they are typically very small (only 1-by-1 pixel) and the same color as the background of the web page, document or e-mail message. We do not use clear GIFs to collect personal information about you. However, we may use clear GIFs to capture statistical usage information for our web pages, features or other elements on a web page. We may correlate this information to a user to personalize user experience and for statistical analysis of user experiences on our web pages. We use third-party vendor Google Analytics to allow tracking technologies and remarketing services on this Site through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the Site, determine the popularity of certain content and better understand online activity. This data is anonymized, only presents general demographic information, and is not used to identify you personally. By accessing our site, you consent to the collection and use of your information by Google Analytics. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to the third-party vendor. However, if you do not want any information to be collected and used by tracking technologies, you can visit the third-party vendor Google Analytics site to make your selections to opt out of this tracking.
7. **Minor Privacy:** We collect information from minors that is required to register and maintain their membership. Information collected includes the child's name, parent or guardian's name and/or email address, gender, and birthdate to validate their age. GREATLIFE UTAH will not request more information than necessary to register and maintain their membership. GREATLIFE UTAH does not knowingly collect any other personal identifiable information from children under the age of 13. Parents must sign up on behalf of their child for a membership if the child is under the age of 13. If a child under 13 has provided us with personal information without parental or guardian consent, the parent or guardian may contact us by emailing us at [info@greatlifeutah.com](mailto:info@greatlifeutah.com). We will remove the

information and unsubscribe your child from any of our electronic marketing lists in compliance with U.S. Children's Online Privacy Protection Act (COPPA). Where required by applicable law, we will ask children for consent from their parents or guardians before we activate their membership, or provide a product or service to them. Consistent with COPPA, we will send an email to the parent or guardian to obtain consent prior to collecting personal information from their child, how consent can be provided, how we plan to use it, and how the parent can revoke consent. If we do not receive parental consent within a reasonable time, we will delete the parent contact information and any other information collected from the child in connection with that activity. We will not use parent or guardian emails provided for parental consent purposes to market to the parent, unless the parent has expressly opted in to email marketing or has separately participated in an activity that allows for such email contact (such as with their own membership with GREATLIFE UTAH). To protect children's privacy and security, we will take reasonable steps to help verify a parent or guardian's identity before granting access to any personal information.

**Use of Contact Information:** If you decide at any time that you no longer wish to receive communications from us, please follow the unsubscribe instructions provided in any of the communications. If you wish to request complete removal of all your personally identifying information, please submit a request by emailing us at [info@greatlifeutah.com](mailto:info@greatlifeutah.com)

### **THIRD PARTIES**

**Third Party Services:** Users may register for other services from our website. Certain products and/or services available on our site are provided to you in partnership with third party(s) and may require you to disclose personally identifiable information in order to register for and access such products and/or services. Such products and/or services shall identify the third party partners at the point of registration. If you elect to register for such products and/or services your personally identifiable information will be transferred to such third party(s) and will be subject to the privacy policy and practices of such third party(s). We are not responsible for the privacy practices and policies of such third party(s) and, therefore, you should review the privacy practices and policies of such third party(s) prior to providing your personally identifiable information in connection with such products and/or services.

**Service Providers:** We engage certain trusted third parties to perform functions and provide services to us, including, without limitation, hosting and maintenance, customer relationship, database storage and management, and direct marketing campaigns. We will share your personally identifiable information with these third parties, but only to the extent necessary to perform these functions and provide such services, and only pursuant to binding contractual obligations requiring such third parties to maintain the privacy and security of your data.

**Law Enforcement:** We cooperate with government and law enforcement officials or private parties to enforce and comply with the law. We may disclose any information about you to government or law enforcement officials or private parties as we, in our

sole discretion, believe necessary or appropriate to respond to claims, legal process (including subpoenas), to protect the property and rights of Company or a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

**Business Transfers:** We may sell, transfer or otherwise share some or all of its assets, including your personally identifiable information, in connection with a merger, acquisition, reorganization or sale of assets or in the event of bankruptcy. You will have the opportunity to opt out of any such transfer if the new entity's planned processing of your information differs materially from that set forth in this Privacy Policy.

## CONSUMER DISCLOSURES

**Consumer Privacy Rights:** Subject to verification of your personal identity or verification of the identity of your authorized agent, it may be requested what personal information or categories of personal information we have collected of you, our sources for collection of your personal information, how we use that information, and what third parties we have shared that information with. **We do not sell your information to third parties.** We do not discriminate against users who exercise their rights to privacy.

## VIDEO SURVEILLANCE

**Procedures:** The purpose of this Operating Procedure (OP) is to regulate, and establish procedures regarding the use of video surveillance for purposes of safety and security. Management shall periodically assess where video surveillance are or should be installed for the purpose of protecting GreatLIFE Utah employees and members. Management will maintain a master inventory of all video surveillance cameras installed on GreatLIFE Utah premises.

**Equipment and Network Maintenance:** Troubleshooting, routine maintenance and minor repairs of video surveillance equipment and software will be handled by management.

**Placement of Video Surveillance Systems:** All VIDEO SURVEILLANCE cameras will be located so that personal privacy is maximized. Use of VIDEO SURVEILLANCE in locker rooms, shower areas, or other areas where there would be a reasonable expectation of privacy will be avoided with respect to all surveillance within the scope of this OP. Kids Clubs may be monitored at all times by a video surveillance system and may also be broadcast live on televisions accessible to third parties on television displays within the club and on treadmills so parents can view their children if they choose to. There shall be no reasonable expectation of privacy in Kids Clubs.

**Required Notice of Video Surveillance:** While there is no legal requirement to do so, signs shall be posted at each club entrance notifying individuals that they are under surveillance. The following language shall be used:

"This area is monitored at all times by a video surveillance system. For questions, please contact GreatLIFE Utah management at [info@greatlifeutah.com](mailto:info@greatlifeutah.com)" Signs shall be posted at the entrance to each Kids Club with the following language: "This area is monitored at all times by a video surveillance system and may be broadcast live on televisions accessible by third parties. For questions, please contact GreatLIFE Utah management at [info@greatlifeutah.com](mailto:info@greatlifeutah.com)"

**Security and Retention of Video Surveillance System Recordings:** Surveillance records for VIDEO SURVEILLANCE shall be stored for a period of not less than sixty (60) days, and will be erased or written over as space is needed, unless retained as directed by GreatLIFE Utah management. VIDEO SURVEILLANCE records should be retained beyond sixty (60) days any time there is an incident of any nature or severity that is depicted. Further, VIDEO SURVEILLANCE records that contain personal information used to make a decision directly affecting an individual shall be maintained. Requests for retention beyond the sixty (60) day period should be documented to ensure that preservation occurs in an efficient and effective manner and that requests are properly noted. All VIDEO SURVEILLANCE records that have been retained pending the final outcome of an investigation shall be numbered, dated, and securely retained in a location to be determined by GreatLIFE Utah management. Preserved materials shall be destroyed in a secure manner as soon as they are no longer needed for purpose for which they were preserved, and their destruction shall be documented.

**Monitoring and Accessing the Recordings of Video Surveillance Systems:** This OP does not imply or guarantee that VIDEO SURVEILLANCE will be monitored in real-time. All monitoring, recording and viewing of recorded activities shall be conducted only at the express direction of GreatLIFE Utah management.

**Release of Video Surveillance System Recordings:** All requests or demands for access to recorded images captured by an GreatLIFE Utah VIDEO SURVEILLANCE, including requests by law enforcement agencies or others, must be conveyed immediately to GreatLIFE Utah management.

## **GENDER POLICY**

GreatLIFE Utah Fitness is committed to providing a safe and supportive fitness environment for all members and employees and to ensuring that every member shall have equal access to the facility and all activities. Additionally, our policy requires that all personnel promote acceptance and respect among members and employees. This policy reflects the reality that there may be transgender and gender nonconforming members and employees. While we will continue to maintain separate facilities for male and female members, transgender members and employees are permitted to use the facilities that align with the gender they identify with. There is no medical or mental health diagnosis or treatment threshold that a member or employee must meet in order to have their gender identity recognized and respected. If another member or employee is making you feel uncomfortable, please share the specifics of the encounter club management so that the incident may be investigated in a timely manner.

## **NO DISCRIMINATION**

GreatLIFE Utah Fitness does not discriminate on the basis of race, color, religion, national origin, sex, gender identity or expression, sexual orientation, age, disability or military status. It is our policy to provide equal employment and fitness opportunities to all persons.

## **GREATLIFE UTAH FITNESS EXTERNAL SOCIAL MEDIA POLICY**

GreatLIFE Utah Fitness encourages social engagement. We welcome all questions, feedback, and comments from our members and community. In order to better protect our online community GreatLIFE Utah Fitness reserves the right to take down posts that violate our social media guidelines including:

**Privacy:** Any posts containing personal or identifiable information. Any image of other members, guests or staff without express permissions. For inquiries about staff or other members, please contact us directly.

**Respect:** Posts containing disrespectful, sexual, or abusive language will be removed. GreatLIFE Utah Fitness may block any users who break these guidelines.

**Content:** GreatLIFE Utah Fitness advocates for the use of social media as a platform to network, exchange ideas, and discover the GreatLIFE Utah Fitness brand. Irrelevant messages, spam, commercial and/or political messages will be deleted.

**Copyright:** Do not share content that violates copyright or intellectual property of others on our social media without proper consent and/or acknowledgment.

We appreciate your engagement and continued support for GreatLIFE Utah Fitness.