

Privacy Policy

Effective Date: August 26, 2019

1. PURPOSE

Welcome to our Privacy Policy. Integrated Platform Services LLC, also known as Constance and together with our affiliates (“Constance”, “we”, or “us”), have adopted this Privacy Policy to let you know how we treat the information that we collect from you online and offline, the kinds of information we may collect, how that information is used, with whom we share it and how you can opt out of a use or correct or change such information. This Privacy Policy supplements and forms a part of the Constance Terms of Service (the “Terms”). Capitalized terms not defined in Section 14 or otherwise in this Privacy Policy have the meaning given to them in the Terms.

2. SCOPE

This Privacy Policy applies to Personal Information that is Processed by Constance in the course of our business, including via the Constance Site, via telephone through our Services, and through our apps, forums, social media accounts, blogs, and other online or offline offerings (together with any and all future online and offline offerings operated by or on behalf of Constance, the “Services”). All individuals whose responsibilities include the Processing of Personal Information on behalf of Constance are expected to protect that data by adherence to this Privacy Policy.

3. TRANSPARENCY/NOTICE—TYPES OF PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT

The types of Personal Information we may collect (directly from you or from Third Party sources) and our privacy practices depend on the nature of the relationship you have with Constance and the requirements of applicable law. Some of the ways that Constance may collect Personal Information include:

- You may provide Personal Information directly to Constance through interacting with the Services, participating in surveys, during events, and requesting Services or information.
- As you navigate the Services, certain passive information may also be collected about your visit, including through cookies and similar technologies as described below.

It is our goal to collect only that information which is relevant for the purposes of Processing. Below are the ways we collect Personal Information and how we use it.

3.1 TYPES OF PERSONAL INFORMATION WE COLLECT

Constance collects Personal Information from its current, prospective, and former clients, customers, users, visitors, guests and Employees (collectively “Individuals”).

- **Information You Provide Directly to Us.** When you use the Services, contact us directly, or engage in certain activities, such as registering for an account with Constance, purchasing Constance products or Services from us, we may ask you to provide some or all of the following types of information:
 - **Purchases.** When you choose to purchase Constance products or Services from us including subscription services offered through any device, we may collect information from you including Personal Information, such as your name, email address, mailing address, phone number, payment information, such as a credit card number and/or other related information that may be required from you to complete your purchase (“Financial Information”). Unless we tell you otherwise at the time of your purchase or application for financing, we do not collect, store or maintain your Financial Information. For more information on how your information is shared in these instances, please see Section 3.5 (“Third Party Payment Processing”) below. We will also collect a username and password in connection with any account created via the Services.
 - **User Profiles.** When you use the Services, you may be given the opportunity to create a “User Profile” and when you do so we may ask you to provide information about yourself such as your username, email address, weight, height, age, location, birthday, phone number and image.

You acknowledge that your User Profile information may be personal to you, and by creating an account and providing such information through the use of our Services, you allow Constance, and any designated individuals or entities to view your User Profile.

- **Voice and Likeness.** We may record telephone calls pursuant to the Services as well as member support and sales calls to train support and sales agents to help resolve member questions and for quality purposes. We may store telephone recordings in accordance with our current data retention policy, if any, or as required by law.
- **Other User Information.** Constance may also collect other information from you as a result of your use of the Services, such as your typical schedule, food preferences, names of family and friends, and entertainment choices. We may associate this information with other Personal Information that you have provided in order to improve and provide the Services and as otherwise described in this Privacy Policy.
- **Communications with Us.** We may collect Personal Information from you such as your email address, phone number or mailing address, when you choose to request information about our Services, visit a retirement community or similar facility (each a “Community”) which utilizes our Services, register to receive Constance communications over email or text messaging, participate in promotions, or loyalty programs that we may offer from time to time, request to receive customer or technical support or otherwise communicate with us.

- **Surveys and Reviews.** From time to time, we (or Third Parties on our behalf) may contact you to participate in surveys or beta testing or provide reviews and testimonials. If you decide to participate, you may be asked to provide certain information, which may include Personal Information. All information collected from your participation in our surveys, reviews or testimonial process, or beta testing is provided by you voluntarily. We may use such information to improve our products, our Site and/or Services, and in any manner consistent with this Privacy Policy.
- **Posting on the Services.** Constance may offer publicly accessible blogs, private messages, video chat or community forums. You should be aware that, when you disclose information about yourself on Constance's blogs, private messages, community forums, and within video chat sessions, Constance will collect the information you provide in such submissions, including any Personal Information. If you choose to submit content, including reviews, to any public area of the Services, such content will be considered "public" and will not be subject to the privacy protections provided in this Privacy Policy.
- **Registration for Sweepstakes or Contests.** Occasionally, Constance may run sweepstakes and contests. We ask those who enter in the sweepstakes or contests to provide contact information (e.g., a phone number or an email address). If you participate in a sweepstakes or contest, your contact information may be used to reach you about the sweepstakes or contest, and, to the extent permitted by law, for other promotional, marketing and business purposes. In compliance with the laws of your jurisdiction, as a participant you may have the opportunity to opt out of any communications that are not related to awarding prizes.
- **Location Information.** Based on your interaction with the Services, the type of device you use to access the Services, and your device's connectivity, we may collect location-based information including your Internet protocol (IP) address, GPS location, longitude/latitude, city, county, zip code and region, and your location and your smart device's proximity to "beacons," Bluetooth networks and/or other proximity systems. We may use this type of information to enhance your user experience, including using location information for the purposes of displaying the geographic distribution of Constance workouts on a heat map, to better understand your interaction with our products and services, or to enable you to track your outdoor run. Unless you otherwise provide us with your consent to do otherwise, this information will only be used by us and our third party service providers to provide you with the Services you request or in an aggregated and anonymized format, which does not identify you. If you no longer wish to have this location information collected and used by us, you may opt out by disabling the location and Bluetooth features in the operating system of your device.
- **Automatic Data Collection.** We may collect certain information automatically through our Services or other methods of web analysis, such as your IP address, cookie identifiers, mobile carrier, mobile advertising identifiers, MAC address, IMEI, Advertiser ID, and other device identifiers that are automatically assigned to your computer or device when you access the Internet, browser type and language, geo-location information, hardware type, operating system, Internet

service provider, pages that you visit before and after using the Services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services such as preferences. For more information on Automatic Data Collection, please see Section 3.3.

- **Information from Other Sources.** We may receive information about you from other sources, including through Third Party services and organizations, to supplement information provided by you. For example, if you access our Services through a Third Party application, such as the Apple App Store or Google Play App Store (together with any similar applications, “App Stores”) or Social Networking Sites (“SNS”) such as Facebook, we may collect information about you from that Third Party application that you have made public via your privacy settings. Information we collect through App Stores or SNS accounts may include your name, your SNS user identification number, your user name, location, sex, birth date, email, profile picture and your contacts on the SNS. This supplemental information allows us to verify information that you have provided to Constance and to enhance our ability to provide you with information about our business, products and Services.

3.2 HOW CONSTANCE USES YOUR INFORMATION

We acquire, hold, use and Process Personal Information about Individuals for a variety of business purposes, including:

- **To Provide Products, Services or Information Requested.** Constance may use information about you to fulfill requests for products, Services or information, including information about potential or future Services, including to:
 - Generally manage Individual information and accounts;
 - Respond to questions, comments, and other requests;
 - Provide access to certain areas, functionalities, and features of Constance’s Services;
 - Assist with monitoring statistics and usage trends;
 - Personalize our Service for you based on your settings, preferences, and historical data;
 - Communicate with you about logistical matters;
 - Review and contact you to answer requests for customer support or technical support; and
 - Allow you to register for events.
- **Administrative Purposes.** Constance may use Personal Information about you for its administrative purposes, including to:

- Measure interest in Constance's Services;
 - Develop new products and Services;
 - Ensure internal quality control;
 - Verify Individual identity;
 - Communicate about Individual accounts and activities on Constance's Services and systems, and, in Constance's discretion, changes to any Constance policy;
 - Send emails to the email address you provide to us to verify your account and for informational and operational purposes, such as account management, customer service or system maintenance;
 - Process payment(s) for products or services purchased;
 - Process applications and transactions;
 - Prevent potentially prohibited or illegal activities; and
 - Enforce our Terms.
- **Marketing Constance Products and Services.** Constance may use Personal Information to provide you with materials about offers, products and Services that may be of interest, including new content or Services. Constance may provide you with these materials by phone, postal mail, facsimile or email, as permitted by applicable law. Such uses include:
 - To tailor content, advertisements and offers;
 - To notify you about offers, products and services that may be of interest or about which you have previously expressed an interest;
 - To provide Services to you;
 - For other purposes disclosed at the time that Individuals provide Personal Information; or
 - Otherwise with your consent. You may contact us at any time to opt out of the use of your Personal Information for marketing purposes, as further described in Section 6 below.
- **Research and Development.** Constance may use Personal Information to create non-identifiable information that we may use alone or in the aggregate with information obtained from other sources, in order to help us to optimally deliver our existing products and Services or develop new products and Services. From time to time, Constance may perform research (online and offline) via surveys. We may engage Third Party service providers to conduct such surveys on our behalf. All survey responses are voluntary, and the information collected will be used for research and reporting purposes to help us better serve Individuals by learning more about their

needs and the quality of the products and services we provide. The survey responses may be utilized to determine the effectiveness of our Services, various types of communications, advertising campaigns and/or promotional activities. If an Individual participates in a survey, the information given will be used along with that of other study participants. We may share anonymous Individual and aggregate data for research and analysis purposes.

- **Direct Mail, Email and Outbound Telemarketing.** Individuals who provide us with Personal Information, or whose Personal Information we obtain from Third Parties, may, as permitted by law, receive periodic emails, newsletters, mailings or phone calls from us with information on Constance's or our business partners' products and services or upcoming special offers/events we believe may be of interest. We offer the option to decline these communications at no cost to the Individual by following the instructions in Section 6 below.
- **Services via Apps and other Devices.** From time to time, Constance may provide Services that are specifically designed to be compatible and used on Third Party devices, such as mobile phones, smart TVs, and tablets. Constance will collect certain information that your device sends when you use such Services, like a device identifier, user settings, location information, carrier and the operating system of your device. These versions of Constance's Services may require that users log in with an account. In such cases, information about use of these versions of the Services may be associated with accounts. In addition, Constance may enable you to download an application, widget or other tool that can be used on mobile, tablet or other devices. Some of these tools may store information on your devices. These tools may transmit Personal Information to Constance to enable you to access accounts and to enable Constance to track use of these tools. Some of these tools may enable users to export reports and other information from the tool. Constance may use personal or non-identifiable information transmitted to Constance to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices Constance provides.
- **Anonymous and Aggregated Information Use.** Constance may use Personal Information and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access Constance's Services or other analyses we create. Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the Services. Anonymized or aggregated information is not Personal Information, and Constance may use such information in a number of ways, including research, internal analysis, analytics and any other legally permissible purposes. We may share this information within Constance and with Third Parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.
- **Sharing Content with Friends or Colleagues.** Constance's Services may offer various tools and functionalities. For example, Constance may allow you to provide information about your friends through our referral services, such as "Refer a Friend." Our referral services may allow you to forward or share certain content with a friend

or colleague, such as an email inviting your friend to use our Services, including current services or other offers they may utilize in the future. Email addresses that you provide for a friend or colleague will be used to send your friend or colleague the content or link you request, but will not be used by Constance for any other purpose.

- **Other Uses.** Constance may use Personal Information for which we have a legitimate interest, such as direct marketing, individual or market research, fraud protection, or any other purpose disclosed to you at the time you provide Personal Information or with your consent.

3.3 COOKIES, PIXEL TAGS/WEB BEACONS, ANALYTICS INFORMATION, AND INTEREST-BASED ADVERTISING

We, as well as Third Parties that provide content, advertising or other functionality on our Services, may use cookies, pixel tags, local storage and other technologies (“Technologies”) to automatically collect information through the Services. We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone or other devices that allow us to record certain pieces of information whenever you visit or interact with our website, services, applications, messaging and tools, and to recognize you across devices.

- **Cookies.** Cookies are small text files placed in visitors’ computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Site may not work properly.
- **Pixel Tags/Web Beacons.** A pixel tag (also known as a web beacon) is a piece of code embedded on the Site that collects information about users’ engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.
- **Social Media Widgets.** The Site may include social media features such as links to Facebook, Instagram, Twitter, YouTube and LinkedIn (that might include widgets, such as, the share this button or other interactive mini-programs). These features may collect your IP address, which page you are visiting on the Site and may set a cookie to enable the feature to function properly. These social media features are either hosted by a Third Party or hosted directly on the Site. Your interactions with these features are governed by the privacy policy of the company providing it.
- **Analytics.** We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services and to develop website content. This analytics data is not tied to any Personal Information. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google’s collection and Processing of data generated by your use of the Services by going to <https://tools.google.com/dlpage/gaoptout>.

Our uses of such Technologies fall into the following general categories:

- **Operationally Necessary.** We may use Technologies that are necessary to the operation of our Site, Services, applications, and tools. This includes Technologies

that allow you access to our Site, Services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of functions such as shopping carts, saved search or similar functions.

- **Performance Related.** We may use Technologies to assess the performance of our Site, applications, Services and tools, including as part of our analytic practices to help us understand how our visitors use our Site, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services or tools;
- **Functionality Related.** We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Sites, Services, applications or tools. This may include identifying you when you sign into our Sites or keeping track of your specified preferences, interests or past items viewed so that we may enhance the presentation of content on our Sites;
- **Advertising or Targeting Related.** We may use first-party or Third Party cookies and web beacons to deliver content, including ads relevant to your interests, on our Sites or on Third Party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as, whether you have clicked on an advertisement.

If you would like to opt out of the Technologies we employ on our Sites, Services, applications or tools, you may do so by blocking, deleting or disabling them as your browser or device permits. See Section 6.6 for additional opt out options. Please note that blocking, deleting, or disabling these Technologies will affect the functionality of our Sites, Services, applications and tools, and may prevent you from being able to access certain features.

3.4 THIRD-PARTY WEBSITES, SOCIAL MEDIA PLATFORMS, AND SOFTWARE DEVELOPMENT KITS

The Site may contain links to other websites and other websites may reference or link to the Constance Site or other Services. These other domains and websites are not controlled by us, and Constance does not endorse or make any representations about Third Party websites or social media platforms. We encourage you to read the privacy policies of each and every website and application with which you interact. We do not endorse, screen or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting other websites or applications is at your own risk.

Constance's Services may include publicly accessible blogs, community forums, message boards, private messaging or video chat features. The Site and our other Services may also contain links and interactive features with various social media or music platforms (e.g., widgets). If you already use these platforms, their cookies may be set on your device when using the Site or other Services. You should be aware that Personal Information which you voluntarily include and transmit online in a publicly accessible blog, video chat session, social media platform or otherwise online, or that you

share in an open forum, may be viewed and used by others without any restrictions. We are unable to control such uses of your information when you interact with a Third Party platform, and by using such services you assume the risk that the Personal Information provided by you may be viewed and used by Third Parties for any number of purposes.

3.5 THIRD-PARTY PAYMENT PROCESSING

When you make purchases through the Services, we Process your payments through a Third Party application, such as an App Store or, in the case of online or in-person purchases via a Third Party payment processor. In these instances, the Third Party application may collect certain Financial Information from you to Process a payment on behalf of Constance, including your name, email address, address and other billing information in which case the use and storage of your Financial Information is governed by the Third Party app's terms, conditions and privacy policies. If you apply for or otherwise take part in a financing offer through one of our financing partners, you will be asked to provide information (which may include Financial Information) to that financing partner, either directly or through the Services. The use of that information by the financing partner will be subject to the financing partner's terms, conditions and privacy policies. Our treatment of any Financial Information that we may Process on your behalf, or that we receive from our financing partners or payment processors, is subject to this Privacy Policy. For more information on our use of Third Party payment processors and financing partners, including the name(s) of the entities that we partner with, please email hello@constance.one.

4. HUMAN RESOURCES DATA (FOR CURRENT, PROSPECTIVE AND FORMER EMPLOYEES AND DESIGNATED INDIVIDUALS)

Constance collects Personal Information from current, prospective and former Employees, their contact points in case of a medical emergency and beneficiaries under any insurance policy ("Human Resources Data"). The Human Resources Data we collect may include your title, name, image, voice recording, address, phone number, email address, social media handle, Constance leaderboard name, date of birth, passport number, driver's license number, Social Security number or other government-issued identification number, financial information related to credit checks, bank details for payroll, information that may be recorded on a CV or application form, language abilities, contact information of Third Parties in case of an emergency, beneficiaries under any insurance policy and other personal and biographical information. We may also collect Sensitive Human Resources Data, such as, details of health and disability, including mental health, medical leave, and maternity leave; information about national origin or immigration status; and optional demographic information, such as, race which helps us achieve our diversity goals.

We acquire, hold, use and Process Human Resources Data for a variety of business purposes including:

- Workflow management, including assigning, managing and administering projects;
- Human Resources administration and communication;

- Payroll and the provision of benefits;
- Compensation, including bonuses and long-term incentive administration, stock plan administration, compensation analysis, including monitoring overtime and compliance with labor laws and company recognition programs;
- Job grading activities;
- Performance and employee development management;
- Organizational development and succession planning;
- Benefits and personnel administration;
- Absence management;
- Helpdesk and IT support services;
- Regulatory compliance;
- Internal and/or external or governmental compliance investigations;
- Internal or external audits;
- Litigation evaluation, prosecution and defense;
- Diversity and inclusion initiatives;
- Restructuring and relocation;
- Emergency contacts and services;
- Employee safety;
- Compliance with statutory requirements;
- Processing of Employee expenses and travel charges; and
- Acquisitions, divestitures and integrations.

5. ONWARD TRANSFER—CONSTANCE MAY DISCLOSE YOUR INFORMATION

5.1 INFORMATION WE SHARE

We may share your information as described in this Privacy Policy (e.g., with our Third Party service providers; to comply with legal obligations; to enhance the Services, to protect and defend our rights and property) or with your permission.

- **We Use Vendors and Service Providers.** We may share any information we receive with vendors and service providers. The types of service providers to whom we entrust Personal Information include service providers for: (i) provision of IT, analytics and

related services; (ii) provision of information and services you have requested; (iii) payment processing; (iv) customer service activities such as deliveries and member support; and (v) in connection with the provision of the Services. Constance has executed appropriate contracts with the service providers that prohibit them from using or sharing Personal Information except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements, and this Privacy Policy.

- **Business Partners, including Communities.** Constance may share Personal Information with our business partners, including Communities, and affiliates for our and our affiliates' internal business purposes or to provide you with a product or service that you have requested. Constance may also provide Personal Information to business partners with whom we may jointly offer products or services, or whose products or services we believe may be of interest to you. In such cases, our business partner's name will appear, along with Constance. Constance requires our affiliates and business partners to agree in writing to maintain the confidentiality and security of Personal Information they maintain on our behalf and not to use it for any purpose other than the purpose for which Constance provided them and to comply with this Privacy Policy.
- **Displaying to Other Users.** The content you post to the Services may be displayed on the Services. Other users of the Site may be able to see some information about you, such as, your name if you submit a review or provide a testimonial. We are not responsible for privacy practices of the other users who view and use the posted information.
- **Marketing – Interest-Based Advertising and Third Party Marketing.** Through our Services, Constance may allow Third Party advertising partners to set tracking tools (e.g., cookies) to collect information regarding your activities (e.g., your IP address, page(s) visited, time of day). We may also share such de-identified information as well as selected Personal Information (such as demographic information and past purchase history) we have collected with Third Party advertising partners. These advertising partners may use this information (and similar information collected from other websites) for purposes of delivering targeted advertisements to you when you visit non-Constance related websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising”. We may allow access to other data collected by the Site to facilitate transmittal of information that may be useful, relevant, valuable or otherwise of interest to you. If you prefer that we do not share your Personal Information with Third Party advertising partners, you may opt out of such sharing at no cost by following the instructions in Section 6 below.
- **Disclosures to Protect Us or Others (e.g., as Required by Law and Similar Disclosures).** We may access, preserve and disclose your Personal Information, other account information and content if we believe doing so is required or appropriate: (i) to comply with law enforcement or national security requests and legal process, such as, a court order or subpoena; (ii) to respond to your requests; (iii) to protect yours', ours' or others' rights, property or safety; (iv) to enforce Constance policies or contracts; (v) to collect amounts owed to Constance; (vi) to comply with records retention policies; (vii) when we believe access, preservation, or disclosure is

necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; or (viii) if we, in good faith, believe that access, preservation, or disclosure is otherwise necessary or advisable. In addition, from time to time, server logs may be reviewed for security purposes – e.g., to detect unauthorized activity on the Services. In such cases, server log data containing IP addresses may be shared with law enforcement bodies in order to allow them to identify users in connection with their investigation of unauthorized activities.

- **Merger, Sale, or Other Asset Transfers.** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets or transition of service to another provider, then your information may be sold or transferred as part of such a transaction as permitted by law and/or contract. In such event, Constance will endeavor to direct the transferee to use Personal Information in a manner that is consistent with the Privacy Policy in effect at the time such Personal Information was collected.

5.2 INTERNATIONAL DATA TRANSFERS

You agree that all Personal Information collected via or by Constance may be transferred, Processed and stored anywhere in the world, including but not limited to, the United States, Canada, the European Union, in the cloud, on our servers, on the servers of our affiliates or the servers of our service providers. Your Personal Information may be accessible to law enforcement or other authorities pursuant to a lawful request. By providing information to Constance, you explicitly consent to the storage of your Personal Information in these locations.

6. OPT-OUT (RIGHT TO OBJECT TO PROCESSING)

6.1 GENERAL

You have the right to object to and opt out of certain uses and disclosures of your Personal Information. Where you have consented to Constance's Processing of your Personal Information or Sensitive Personal Information, you may withdraw that consent at any time and opt out to further Processing by contacting hello@constance.one. Even if you opt out, we may still collect and use non-Personal Information regarding your activities on our Site and/or information from the advertisements on Third Party websites for non-interest based advertising purposes, such as, to determine the effectiveness of the advertisements.

6.2 EMAIL, TEXT AND TELEPHONE COMMUNICATIONS

You can unsubscribe from email, text and phone communications at any time. To stop receiving our promotional emails, follow the unsubscribe instructions in the email messages you receive from us or use the information in Section 12 to contact us. To opt out of receiving text messages, follow the opt out instructions in the text messages that you receive from us. We will process your request within a reasonable time after receipt, in accordance with applicable laws. Note that you will continue to receive transaction-

related emails regarding products or services you have requested until you opt out of receiving such emails. We may also send you certain non-promotional communications regarding Constance and our Services and, to the extent permitted by law, you will not be able to opt out of those communications (e.g., communications regarding updates to our Terms or this Privacy Policy).

We maintain “do-not-call” and “do-not-mail” lists as mandated by law. We process requests to be placed on do-not-mail, do-not-phone and do-not-contact lists within 30 days after receipt, or such shorter time as may be required by law.

6.3 MOBILE DEVICES

Constance may occasionally send you push notifications through our Apps with updates, achievements and other notices that may be of interest to you. You may at any time opt out from receiving these types of communications by changing the settings on your device. Constance may also collect location-based information if you use our Apps. You may opt out of this collection by changing the settings on your device.

6.4 HUMAN RESOURCES DATA

With regard to Personal Information that Constance receives in connection with an employment relationship, Constance will use such Personal Information only for employment-related purposes as more fully described above. If Constance intends to use this Personal Information for any other purpose, Constance will notify the Individual and provide an opportunity to opt out of such uses. Employees who elect to use the Services will be treated as users in accordance with this Privacy Policy.

6.5 “DO NOT TRACK”

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

6.6 COOKIES AND INTEREST-BASED ADVERTISING

As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile advertisements via their device settings.

The online advertising industry also provides websites from which you may opt out of receiving targeted ads from our data partners and our other advertising partners that participate in self-regulatory programs. You can access these, and also learn more about targeted advertising and consumer choice and privacy, at www.networkadvertising.org/managing/opt_out.asp, and www.aboutads.info/choices/. You can also choose not to be included in Google Analytics [here](#).

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt out on each device. Advertisements on Third Party websites that contain the AdChoices link, and that link to this Privacy Policy, may have been directed to you based on anonymous non-Personal Information collected by advertising partners over time and across websites. These advertisements provide a mechanism to opt out of the advertising partners' use of this information for interest-based advertising purposes.

7. RIGHTS OF ACCESS, RECTIFICATION, ERASURE, AND RESTRICTION

Where permitted by applicable law, you may inquire as to whether Constance is Processing Personal Information about you, request access to Personal Information, and ask that we correct, amend or delete your Personal Information where it is inaccurate or has been Processed in violation of your rights under data privacy laws that apply in the country where you live. Where otherwise permitted by applicable law, you may send an email to hello@constance.one or use any of the methods set out in this Privacy Policy to request access to, receive, seek rectification, or request erasure of Personal Information held about you by Constance. Please include your full name, email address associated with your account and a detailed description of your data request. Such requests will be processed in accordance with local laws.

Although Constance makes good faith efforts to provide Individuals with access to their Personal Information, there may be circumstances in which Constance is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others' privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual's privacy, in the case in question or where it is commercially proprietary. If Constance determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Constance will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Information.

8. DATA RETENTION

Constance retains the Personal Information we receive as described in this Privacy Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements and comply with applicable laws. When we are no longer required to retain the Personal Information as described above, we may destroy, erase, or de-identify it. Legal requirements, however, may require us to retain some or all of the Personal Information we hold for a period of time that is longer than that for which we might otherwise hold it.

9. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. We maintain commercially reasonable administrative, technical and physical safeguards (which may vary depending on the sensitivity of the Personal Information) designed to protect against unauthorized use, disclosure or access of Personal Information. Unfortunately, the Internet cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any information you provide to us. We do not accept liability for unintentional disclosure.

By using the Services or providing Personal Information to us, you agree that we may communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. If we learn of a security breach, we may attempt to notify you electronically by posting a notice on the Site or sending an email to you. You may have a legal right to receive this notice in writing.

10. NON-U.S. USERS

By using the Services, you consent to Constance's transfer of your data to the United States. By choosing to visit the Site, use the Services, or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will, to the extent permitted by law, be governed by the laws of the Commonwealth of Pennsylvania, without regard to principles of conflicts of law. Any disputes arising in connection with this Privacy Policy will be handled in accordance with the dispute resolution provisions in the Terms.

If you are visiting from the European Union or other regions with laws governing data collection and use, please note that you are agreeing to the transfer of your information to the United States and to Processing of your data globally. By providing your Personal Information, you consent to any transfer and Processing in accordance with this Privacy Policy.

11. CHILDREN'S PRIVACY

Our Services are not directed to children under the age of 13. In addition, you are not permitted to use our Services if you do not meet the minimum age requirement applicable to our Services in your jurisdiction. We do not knowingly collect Personal Information from children under the age of 13. If you learn that your child has provided us with Personal Information without your consent, you may alert us at hello@constance.one. If we learn that we have collected Personal Information of a child under the age of 13 (or under the age of 16 in certain jurisdictions, such as EU member countries) we will take steps to delete such information from our files as soon as possible and terminate the child's account unless we receive verifiable parental consent.

12. REDRESS/COMPLIANCE AND ACCOUNTABILITY

If you have any questions about our privacy practices, this Privacy Policy, or how to submit a complaint with the appropriate authority, please contact Constance by email at

hello@constance.one or by mail at the below address. We or our Data Protection Officer will address your concerns and attempt to resolve any privacy issues in a timely manner.

Integrated Platform Services LLC
245 East King Street
Lancaster, PA 17602

13. OTHER RIGHTS AND IMPORTANT INFORMATION

13.1 CHANGES TO OUR PRIVACY POLICY AND PRACTICES

This Privacy Policy may change from time to time. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you use the Services after the updated Privacy Policy is posted on the Services (as reflected in the above Effective Date). If at any point you do not agree to any portion of the Privacy Policy, you must immediately stop using the Services.

- **Revisions to the Privacy Policy.** We may revise this Privacy Policy in our sole discretion, so please review it periodically. If you continue to visit the Site and use the Services after such changes have been made, you thereby provide your consent to the changes.
- **Posting of Revised Privacy Policy.** If there are any material changes to this Privacy Policy, Constance will notify you by email or as otherwise required by applicable law. We will post any adjustments to the Privacy Policy on this web page, and the revised version will be effective immediately when it is posted (or upon notice if applicable). If you are concerned about how your information is used, bookmark this page and read this Privacy Policy periodically.
- **New Uses of Personal Information.** Additionally, before we use Personal Information for any new purpose not originally authorized by you, we will endeavor to provide information regarding the new purpose and give you the opportunity to opt out. Where consent of the Individual for the Processing of Personal Information is required by law or contract, Constance will endeavor to comply with the law or contract.

13.2 CALIFORNIA PRIVACY RIGHTS

California law permits users who are California residents to request and obtain from us once per year, free of charge, a list of the Third Parties to whom we have disclosed their Personal Information (if any) for direct marketing purposes in the prior calendar year, as well as the type of Personal Information disclosed to those parties.

14. DEFINITIONS

The following capitalized terms have the meanings set forth below.

- “Agent” means any Third Party that Processes Personal Information pursuant to the instructions of, and solely for, Constance or to which Constance discloses Personal Information for use on its behalf.
- “Employee” refers to any current, temporary, permanent, prospective or former employee, director, contractor, worker, or retiree of Constance or its subsidiaries worldwide.
- “Personal Information” is any information relating to an identified or identifiable natural person (“Individual”).
- “Process” or “Processing” means any operation which is performed upon Personal Information, whether or not by automatic means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- “Sensitive Data” or “Sensitive Personal Information” is a subset of Personal Information which, due to its nature, has been classified by law or by policy as deserving additional privacy and security protections. Sensitive Personal Information includes, certain Financial Information, and Personal Information regarding EU residents that is classified as a “Special Category of Personal Data” under EU law, which consists of the following data elements: (1) race or ethnic origin; (2) political opinions; (3) religious or philosophical beliefs; (4) trade union membership; (5) genetic data; (6) biometric data where Processed to uniquely identify a person; (6) health information; (7) sexual orientation or information about the Individual’s sex life; or (8) information relating to the commission of a criminal offense.
- “Third Party” is any company, natural or legal person, public authority, agency, or body other than the Individual, Constance or Constance’s Agents.