

## Privacy Policy

Dibs Technology, Inc., (“Dibs”) provides pricing and booking software to fitness studios. This Privacy Policy describes how we collect, use and protect information collected from customers who use our service by visiting our website [ondibs.com](http://ondibs.com), booking on a partner studio’s website, or booking via a Dibs mobile app. By booking classes with our software, you have agreed and are additionally subject to the Terms of Service, which incorporates this Privacy Policy by reference. The effective date of the current policy is September 23, 2016.

### Overview:

We allow customers to create one account on Dibs, which they may use to seamlessly book classes with any partner studio. Dibs will never share your Personal Information with a partner studio, unless you have explicitly granted permission by logging in to the party’s website or app with your Dibs account and agreed to studio’s terms & conditions. Dibs does not store your financial information; all financial information is stored with our payment processor Stripe, and will never be shared with anyone other than Stripe.

### What Information Do We Collect?

#### Personal Details

We may collect the following personal details during on our website or at a partner studio that uses our software to process class bookings:

- First and last name
- Email
- Birthday
- Mobile Phone Number
- Address
- Emergency Contact Details

In addition, if you contact us by email through our website, we may keep a record of your contact information and correspondence.

We reserve the right to use your email address and any other personally identifiable information that you provide to send you marketing materials for our own products and services, from which you can always opt out by updating your personal settings.

### Financial Details

In order to use the Dibs platform to book classes at partner studios, you will need to link a payment instrument, such as a debit or credit card account number, to your Dibs account. Dibs will only collect Financial Information from Users using a secure, transparent pass through to our third-party payment gateway provider (Stripe), and Dibs will never store your Financial Information itself.

### Web/Mobile Tracking Information

Like most websites, our website may incorporate tracking technologies and cookies that allow us to track the actions of our website visitors. Tracking technologies and cookies are used to collect non-personally identifiable information, such as the name of your internet service provider, the IP address of the computer you are using, the type of browser software and operating system that you use, the date and time you access our website, the website address, if any, from which you linked directly to our website, the website address, if any, to which you travel from our website, your home page customization preferences and other similar traffic-related information. We may aggregate your information with similar data collected from other visitors to help us improve our website.

## How Does Dibs Use and Disclose Your Information?

### Personal Details

Dibs will use and store your Personal Details to allow you to book at partner studios that use the Dibs platform; to send rewards to you; to improve our products and services; to investigate (and remedy) fraudulent or allegedly fraudulent activity; and to perform aggregated data analysis.

Dibs will not disclose your personal details to unaffiliated third parties. However, we do reserve the right to provide your information to third parties who help us deliver or improve our service. A few examples are outlined below:

1. **Studio Partners:** If you choose to log in and book a class at a Studio Partner that uses the Dibs platform, the studio will receive access to your personal details. This does not include your account password, which is strictly confidential and encrypted in our database.
2. **Mindbody, Zingfit, or other Booking Software:** The studios we partner with often work with an additional third-party booking system to help manage the class schedule and

roster. If you have specifically authorized a studio to have access to your information by logging into their site or app with your Dibs account, your personal details (but not financial details) may be passed through to their secure database.

3. Services that distribute marketing materials or advertisements on our behalf.
4. If we sell Dibs or any part of its assets, or Dibs enters into a joint venture with another business entity, we may disclose your personal information to our new business partners or owners who may then provide you with information about their products and services

Financial Information: Dibs will only ever use your Financial Information for the purpose of submitting an authorized charge to your payment instrument, in accordance with Dibs's Terms & Conditions. Financial Information is never provided to Dibs in unencrypted form, or stored by Dibs. Your Financial Information is never disclosed to third parties, including Dibs' partner studios, other than Dibs' payment gateway provider (Stripe).

Email Communications: If you create a Dibs account and provide your email address, we will send you administrative and promotional emails concerning the Dibs platform. If you wish to opt out of promotional emails, you may do so by following the "unsubscribe" instructions in the email, by contacting Dibs Support at [info@ondibs.com](mailto:info@ondibs.com), or by editing your Dibs User Account settings as described below.

### [How to Update the Personal Details Stored on Dibs](#)

You can log into your account at any time to update your email preferences, modify your personal details, or remove your financial information. Any adjustments to your Dibs account at one partner studio will be made across any studios where you have used your Dibs account.

If you would like to remove your details and wipe all personal data from our database, you can deactivate your account. This will also remove your financial information from Stripe.

You can update your personal details or remove your financial information at any time by logging into your Dibs account at any partner studio; this will update your account across all partner studios you have used.

### [EU Compliance](#)

Dibs complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. Dibs has certified to the Department of

Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit : <https://www.privacyshield.gov/> In the context of an onward transfer, a Privacy Shield organization has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. The Privacy Shield organization shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the organization proves that it is not responsible for the event giving rise to the damage. In compliance with the Privacy Shield Principles, Dibs commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Dibs: By Email: [info@ondibs.com](mailto:info@ondibs.com) By Phone: +1 646 760 3427 or +44 (0) 20 33898689 Dibs has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU. Dibs is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). Dibs may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

### [Text Messaging / SMS Policy](#)

When you provide us with your mobile phone number, you agree that Dibs may send you text messages (including SMS and MMS) to that phone number. You will receive a confirmation text message, and you may need to reply as instructed to complete registration. Message and data rates apply. Reply STOP to cancel, HELP for help. You agree to receive a final text message confirming your opt-out. You may opt-out at any time by texting the word STOP to shortcode 33233. You agree to receive a final text message confirming your opt-out. For help, send a text message with the keyword HELP to short code 33233. Texts may be sent through an automatic telephone dialing system. Consent is not required to purchase our goods or services. You agree to notify us of any changes to your mobile number and update your account us to reflect this change. Your carrier may prohibit or restrict certain Mobile Features and certain Mobile Features may be incompatible with your carrier or mobile device. Contact your carrier with questions regarding these issues.

Dibs will never charge you for the text messages you receive. You might see some message & data rate charges from your mobile provider, though, so be sure to check your plan.

Any information communicated to rookie for text messaging and or storage will remain in the ownership of the user, which will store securely in accordance with our security policy and the law. Dibs will take the necessary steps to secure your personal information with safeguards appropriate to the sensitivity of the information. Dibs will, at no time, rent or redistribute this information without your consent, except where legally required to do so.

It is policy, that just as a user must opt in to a text marketing list, they have the right to opt out of a particular text marketing list as well. When a user opts out of a text marketing list, they will no longer receive any texts unless they, themselves, re-subscribe.

### [This Website Uses Google Adwords](#)

This website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site or audiences similar to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the ondibs.com website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy. You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

### [Security & Information Retention](#)

We employ security measures to protect your personal information both online and offline from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. We encrypt many of our services using SSL. We will retain your personal information for a reasonable period or as long as the law requires.

### [Right to Update or Revise Privacy Policy](#)

We reserve the right to update and revise this Privacy Policy at any time. You will know if this Privacy Policy has been revised since your last visit to the website by referring to the "Effective

Date of Current Policy" date at the top of this page. Your use of our website constitutes your acceptance of this Privacy Policy as amended or revised by us from time to time, and you should therefore review this Privacy Policy regularly.

### Hyperlink Policy

Please be aware that the Site may contain links to third party websites. Any such link is provided only as a convenience. The inclusion of any link does not imply an affiliation, sponsorship, endorsement, approval, investigation, verification or monitoring by Dibs of any information contained in any third party website. In no event shall Dibs be responsible for the information contained on that website or your use of or inability to use such website. You should also be aware that the terms and conditions of such website and the website's privacy policy may be different from those applicable to your use of the website.