

Privacy at Thrive Circle

May 17, 2021

At Thrive Circle, we offer a private space where you can work on yourself in the company of those you love and trust. We know you care about how your personal data is used and shared.

We take your privacy seriously. Here are the highlights of our Privacy Policy. The full policy is included for your reference below.

1. How does Thrive Circle protect the content I create?

You get to choose who sees the content you create, including but not limited to your daily reflections and check-in insights. In medieval times, the “keep” was like the castle within the castle, offering an additional layer of protection. Similarly, each circle within Thrive Circle is like a keep within the castle of Thrive Circle. The “outer wall” is the fact that content users create on Thrive Circle is not visible on the internet at large. The “inner wall” is that the content users create in their circles is not visible to those in other circles. There is also a third layer of protection, which is that you choose whether to share your content with your circles outside of a challenge.

2. What personal data do we collect?

We collect information that you give us at registration. We periodically review content created on the app, both to improve the effectiveness of our Services and to ensure Circle Safety policies are being followed. We automatically collect some data about how the app is being used (e.g., when it is opened, what content gets more engagement, what gets less) to help us improve it. We do not collect geo-location data, biometric data, or sensory data. We do not sell your data to third parties.

3. How does Thrive Circle access contacts or photos on my phone?

We only access your contacts when you are trying to invite someone to a circle. We do not retain the list of contacts or make use of it in any way. We only access your photos temporarily and with your permission; for example, when you are trying to share a photo or video in the chat or set your profile picture. We do not retain access or make use of your photos in any way.

Thrive Circle, Inc.
Detailed Privacy Policy
May 17, 2021

Please read the following to learn more about our Privacy Policy.

1. WHAT DOES THIS PRIVACY POLICY COVER?

- a. This Privacy Policy ("Policy") explains our policies regarding the collection, use, disclosure and transfer of your information by Thrive Circle and/or its subsidiaries and/or affiliates (collectively referred to as the "Company"), which operates various websites, including sub-sites, platforms, applications, web platforms and other platforms (collectively referred to as "the Sites") for delivery of information, products, offerings and content via any mobile or internet connected device or otherwise (collectively the "Services").
- b. Please read this Privacy Policy along with the Terms and Conditions linked separately to this website. Capitalized terms which have been used here but are undefined shall have the same meaning as attributed to them in the Terms and Conditions. This Privacy Policy is applicable to persons who access, browse or use the Services ("User"). For the purpose of this Policy, wherever the context so requires "you" or "your" shall mean User and the term "we", "us", "our" shall mean Company.
- c. As noted in the Terms and Conditions, we do not knowingly collect or solicit personal information from anyone under the age of 18. If you are under 18, please do not attempt to register for the Services or send any personal information about yourself to us. If we learn that we have collected personal information from a person under age 18, we will delete that information as quickly as possible. If you believe that a person under 18 may have provided us with personal information, please contact us at support@thrivecircle.co
- d. As we update, improve, and expand the Services, this Policy may change, so please refer back to it periodically. By accessing and using the Sites or otherwise using the Services, you consent to the collection, storage, and use of the personal data you provide (including any changes thereto as provided by you) for any of the Services that we provide.
- e. We gather various types of Personal Data from our users, as explained in more detail below, and we use this Personal Data internally in connection with our Services, including to personalize, provide, and improve our services, to allow you to set up a user account and profile, to contact you and allow other users to contact you, and to analyze how you use the Services. In certain cases, we may share some Personal Data with third parties, but only as described in this document.
- f. Thrive Circle respects the privacy of the Users of the Services and is committed to protect it in all respects. The data about the User as collected by the Company is: (a) information you provide to us, (b) content you create, and (c) information automatically tracked while navigation. We refer to these three types collectively as "Personal Data" or "Data" below.
- g. We maintain a Privacy Program to enhance and promote compliance with privacy law and data protection principles. You can contact us directly to answer questions, access, amend, or correct your information and resolve issues and disputes. If you have any questions relating to our use of your Personal Data, please contact us at support@thrivecircle.co.

2. WHAT DATA DOES THRIVE CIRCLE COLLECT?

- a. Information You Provide to Us
 - i. Registration Data: We receive and store any information you knowingly provide to us. For example, through the registration process and/or through your account settings, we collect Personal Information such as your phone number, gender, and a name in order. We also ask you to provide your age and a photo and how you heard about Thrive Circle. We collect the zip code of the credit card used to provide payment, but we do not capture your location.
 - ii. Permissions that we need:
 - 1. The Company accesses your photos to allow you to add them to the chat or the journal. We do not store your photo library on our servers, and we only access this information when you select a photo to include in the chat or the journal.
 - 2. Within the application, we ask for your consent to receive notifications from the Thrive Circle app.
 - 3. We ask for access to your contact list when you are inviting friends to join a Circle, but we do not store that information.
- b. Content You Create
 - i. Actions: You decide how you want to describe what daily action(s) you are practicing, and add, edit or delete those actions, as needed.
 - ii. Check-in insights: You decide what you want to document about what you noticed or learned when check-in on whether you did your action or not.
 - iii. Daily reflections: You decide what you want to share as an answer to the daily reflection question.
 - iv. Chat messages: You decide what you want to write in chats with your circle or buddies.
 - v. Reactions: You decide if you want to select an emoji reaction to chat messages.
 - vi. Other journal entries: You decide if you want to create new journal entries beyond your check-in insights and answers to daily reflection questions.
 - vii. Other forms of content you create: There may be other forms of content that you create as a part of customizing your experience within Thrive Circle.
- c. Information Collected Automatically
 - i. When you make an account, we collect your device ID and device type.
 - ii. We may collect de-identified information about your habits and patterns within the app as a part of the Services. We collect such information so that we can better understand how to update our app in a way that benefits you. For example, this data can tell us how often users engage with a particular feature of the Services, and we can apply that knowledge to make our features better to serve as many users as possible. We may also use this data to customize your experience, based on your usage patterns.

3. HOW IS PERSONAL DATA USED?

- a. We use this Personal Data internally in connection with our Services, including to allow you to set up a user account and profile, to contact you and allow other users to contact you, to personalize and provide our services, and to analyze how you use the Services so that we can make them better for you and other users.
- b. We may ask for your permission to communicate with you directly to ask questions about your user experience. You can refuse our permission to ask you questions, and you are also not required to answer any questions.

- c. In the future, if you provide your email address and consent to email offers, we may send you promotional emails, recommend certain products or services, or email you about your use of the Services. We will stop contacting you if you email us at support@thrivecircle.co and request that we cease contact.
- d. We do not rent or sell your Personal Data in a personally identifiable form to anyone, provided certain Personal Data may be transferred in connection with business transfers, as described below. We may share your Personal Data with third parties only as described in this section:
- i. Agents: We may employ other companies and people to perform tasks on our behalf and need to share your information with them to provide products or services to you. Unless we tell you differently, our agents do not have any right to use the Personal Data we share with them beyond what is necessary to assist us.
 - ii. User Profiles: Please remember that the photo and name that you upload to your user profile can be seen by other users. Your user name and photo may also be displayed to other users if and when you complete prompts, send messages or comments, upload images/gifs/photos/videos, or interact with users in another way through the Services. Other user profile information may be displayed to other users if you choose.
 - iii. Sharing to the Thrive Circle community: We may enable you to share content with the Thrive Circle community. If you choose to do so, this content may be viewed by users who are not in your Circle(s).
 - iv. Third-Party Service Providers: the Company is committed to keeping your information from third parties when possible. However, due to our early stage of application development, we employ other companies and individuals to perform certain functions on our behalf. We are working on building our own resources for such functions. In the meantime, here is a list of our providers and their functions for your reference:
 - 1. All Application Data (including Personal Data, and any other Content associated with the Services) is stored in Amazon Web Services, which also helps us to improve the reliability and stability of our app.
 - 2. We use SendGrid / Twilio as our chat service provider.
 - v. These third party service providers must process your information in accordance with this Privacy Notice and as permitted by applicable data protection law.
- e. The Company shares your Information with any third party without obtaining the prior consent of the User in the following limited circumstances:
- i. When it is requested or required by law or by any court or governmental agency or authority to disclose, for the purpose of verification of identity, or for the prevention, detection, investigation including but not limited to cyber incidents, or for prosecution and punishment of offenses. These disclosures are made in good faith and belief that such disclosure is reasonably necessary for enforcing these Terms or for complying with the applicable laws and regulations.
 - ii. The Company proposes to share such Data to conduct its business and to share this Information within its group companies and officers and employees of such group companies for the purpose of processing Personal Data on its behalf. We also ensure that these recipients of such Information agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.
 - iii. We may share your information when we believe in good faith that such sharing is reasonably necessary in order to investigate, prevent, or take action regarding possible illegal activities or to comply with legal process. We may also share your information to investigate and address threats or potential threats to the physical safety of any person, to investigate

and address violations of this Privacy Policy or the Terms and Conditions, or to investigate and address violations of the rights of third parties and/or to protect the rights, property and safety of the Company, our employees, users, or the public. This may involve the sharing of your information with law enforcement, government agencies, courts, and/or other organizations on account of legal requests such as subpoena, court order or government demand to comply with the law.

- f. The information we collect about you, in certain cases is transferred to the servers hosted in third countries, by the third parties engaged by us.
- g. Some countries that are not members of the European Economic Area (EEA) are recognized by the European Commission as providing an adequate level of data protection according to EEA standards. For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, including by ensuring that the recipient is bound by relevant data protection contractual clauses, to protect your personal data.

4. WHAT ARE YOUR DATA PROTECTION RIGHTS?

- a. We offer all of our users the data protection rights required by the European Union as well as the state of California, including:

- i. Data Access and Portability:** You may request a copy of any of your Personal Data which we are processing. We will provide this free of charge, together with information about the processing, such as the purposes of the processing and the categories of Personal Data concerned. We will provide this in a structured, commonly used and machine-readable format and you may have the right to transmit this data to another entity.

- ii. Rectification:** You may edit some of your Personal Data when you have access to do so. You may also ask us to change, update or fix your Personal Data if you cannot edit it and it is inaccurate.

- iii. Erasure (or Deletion):** You may request the erasure (or deletion) of your Personal Data.

- iv. Restrict Processing:** You may ask us to restrict the processing of your Personal Data under certain circumstances, such as if your Personal Data is inaccurate or unlawfully held.

- v. Object to Processing:** You may object to the processing of your Personal Data on grounds relating to your particular situation under certain circumstances, for example for direct marketing. If you exercise this right, your Personal Data will no longer be processed for such purposes by us, unless there are overriding compelling legitimate grounds for the processing or as otherwise provided under applicable law.

- vi. Exercising these rights:** To exercise any of these rights, please email support@thrivecircle.co with SUBJECT: PERSONAL DATA REQUEST. Note that this is not an absolute right and the interests of other individuals may restrict your right of access. We may decline or charge a reasonable administrative cost for requests which are excessive, particularly if repetitive.

- vii. Mechanism for redress:** Any complaints, abuse, or concerns with regard to the use, processing, and disclosure of Personal Data provided by you or breach of these terms should immediately be informed via writing or through email to support@thrivecircle.co. We may reach out to you to confirm or discuss certain details about your complaint and issues raised. We are not responsible for any communication, if addressed, to any non-designated person in this regard. We request you to please provide the following information in your complaint:

1. Identification of the information provided by you;
2. Clear statement as to whether the information is personal data or sensitive personal information;

3. Your address, telephone number or email address;
 4. A statement that you have a good-faith belief that the personal data has been processed incorrectly or disclosed without authorization, as the case may be;
 5. A statement, under penalty of perjury, that the information in the notice is accurate, and that the information being complained about belongs to you;
- b. Under EU data protection laws, EU citizens are individuals who may have certain data protection rights which may be subject to limitations and/or restrictions and which includes: (i) the right to request access to and, rectification or erasure of your Personal Data; and (ii) the right to ask us to restrict the processing of your Personal Data. You may also have (iii) a right to object to processing of your Personal Data where carried out for our legitimate interest or direct marketing. Individuals may also have a right to lodge a complaint about the processing of their Personal Information with their local data protection authority. All of these are covered in section 4a above.
- c. Under California Civil Code Section 1798.100 (California Consumer Privacy Act), California residents may have certain data protection rights regarding their personal data. These rights which may be subject to limitations and/or restrictions include: (i) the right to disclosure, deletion, access, and nondiscrimination; and (ii) the right to opt out of having your Personal Information shared or sold. Thrive Circle does not sell or share your Personal Information with third-party companies for their direct marketing purposes without your consent. All of these are covered in section 4a above.
- d. The following are categories of Personal Data defined under the Act we may receive in the course of administering the Services: Identifiers, personal information as described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), Protected classification characteristics under California or federal law, Commercial information, Biometric information, Internet or other electronic network activity, Geolocation data, Sensory data, Professional or employment-related information, Non-public education information, and inferences drawn from other personal information.

5. PROTECTING YOUR PERSONAL DATA

- a. Any information you include in a posting to a circle is available to anyone in that circle.
- b. We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices, and security measures, including appropriate encryption and physical security measures to guard against unauthorized access to systems where we store personal data. All information gathered on the Company is securely stored within the Company controlled database. The database is stored on servers secured behind a firewall; access to the servers is password-protected and is strictly limited.
- c. However, as effective as our security measures are, no security system is impenetrable. We cannot guarantee the security of our database, nor can we guarantee that the information you supply will not be intercepted while being transmitted to us over the Internet.
- d. We assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorized third-party access, or other causes beyond our control. You play an important role in keeping your personal information secure.

6. NOTIFICATION IF PRIVACY POLICY CHANGES

- a. As we improve our Services in the future, we may need to change this Privacy Policy. If this policy changes, we will alert you to such changes by placing a notice on the Services and/or by some other means. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes.
- b. Mechanism to withdraw consent:
 - i. You can request the Company to delete your information. In some cases, we may however retain information for a limited period for legitimate business or legal purposes.
 - ii. To delete your Personal Data, please share your request on support@thrivecircle.co with the subject "PERSONAL DATA REQUEST / DELETION REQUESTED".
 - iii. Please note that there may be delays between your request and deletion of the data, as we try to ensure protection of your information against accidental or malicious deletion requests.

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Thank you for reading our Privacy Policy.