



Privacy Policy

Updated: December 9, 2021

Flowell ("Flowell," "we," or "our"), recognizes the importance of your personal privacy. Therefore, we have created this Privacy Policy so that you know how we use and disclose your information when you make it available to us. The Privacy Policy below discloses our practices regarding data collection and usage for the website located at flowell.co, the related mobile websites, and the mobile application called "Flowell" (the "App") (collectively, the "Service").

By using or accessing the Service, you signify your agreement to be bound by this Privacy Policy. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY YOU MAY NOT ACCESS OR OTHERWISE USE OUR SERVICE OR PARTICIPATE IN OUR SERVICE.

Key aspects of our privacy practices described in this Privacy Policy include the following explanations:

- The data that we collect and why we collect it;
- How we use that data;
- How we share data; and
- The rights to your data.

Personal Data That We Collect:

You may be required to submit certain personal data when you register on the Service. The personal data which you may provide to us could include your first and last names, email, gender, date of birth, phone number, location, and other personal data collected from you or through some other form of consent from you or notification to you. If you are an instructor, you may be required to submit your social security number or employer identification number and insurance information.

Geo-Location Information:

When you access or use the Service, Flowell may access, collect, monitor and/or remotely store "location data," which may include GPS coordinates (including but not limited to latitude and/or longitude), IP addresses, and/or similar information regarding the actual location of your device. Location data may convey to us information about how you browse or use the Service. Location data does not collect or share any personal data about you. Location data may be used in conjunction with personal data. Some features of the Service, particularly any location-based services, may not function properly if use or availability of location data is impaired or disabled.

Non-Personal Or Aggregate Data That We Collect:

When you access our Service, we may automatically collect non-personal data from you, such as web pages viewed, browser type, operating system, referring service, search information, device type, page views, usage and browsing habits on the Service and similar data. We may also aggregate demographic information collected from our users (such as the number of users in a particular geographical location) in a manner which does not identify any one individual. We may also aggregate information collected offline in connection with the Service, obtain non-personal data from third party sources and develop aggregate data by anonymizing previously collected personal data.

It is possible at times when collecting non-personal data through automatic means that we may unintentionally collect or receive personal data that is mixed in with the non-personal data. While we will make reasonable efforts to prevent such incidental data collection, the possibility still exists. If you believe that we have inadvertently collected your personal data, please notify us at support@flowell.co.

Information Usage:

We will only use your personal data as described below, unless you have specifically consented to another type of use, either at the time the personal data is collected from you or through some other form of consent from you or notification to you:

- We may share your personal data collected in connection with providing the Service.
- We may use your personal data to respond to your inquires or requests.
- We may use your personal data to send you emails from time to time about our services, but we will not provide your personal data to third parties for them to contact you directly unless

otherwise permitted by this Privacy Policy or you provide your consent.

- We may share your personal data with third parties to further the purpose for which you provided such information to us. Specifically, we may share your information with the following third party vendors (collectively, the “Third Party Vendors”):

Third Party Vendor	Privacy Policy
Stripe	https://stripe.com/privacy

We urge you to read the privacy practices of all of our Third Party Vendors before submitting any personal data through the Service.

- We may disclose personal data as required by law or legal process.
- We may disclose personal data to investigate suspected fraud, harassment or other violations of any law, rule or regulation, or the terms or policies for our services or our sponsors.
- We may transfer your personal data in connection with the sale or merger or change of control of Flowell or the division responsible for the services with which your personal data is associated.
- We may share your personal data with an affiliate of Flowell who is in the same corporate family as us as long as their privacy practices are substantially similar to ours.

Non- personally identifiable or aggregate information may be used by us for any purposes permitted by law and may be shared with any number of parties, provided that such information shall not specifically identify you.

Cookies and Similar Technologies:

“Cookies” are pieces of information that may be placed on your computer by a service for the purpose of facilitating and enhancing your communication and interaction with that service. Many services use cookies for these purposes. We may use cookies (and similar items such as clear gifs, web beacons, tags, etc.) on our Service to customize your visit and for other purposes to make your visit more convenient or to enable us to enhance our Service. We may also use and place cookies (and similar items) on your computer from our third party service providers in connection with the Service, such as an analytics provider that helps us manage and analyze Service usage, as described more fully below. In addition, our advertisers and business

partners may set cookies and similar items on your computer when you use our Service. You may stop or restrict the placement of cookies on your computer or flush them from your browser by adjusting your web browser preferences, in which case you may still use our Service, but it may interfere with some of its functionality. Cookies and similar items are not used by us to automatically retrieve personal data from your computer without your knowledge.

You should be able to control how and whether cookies will be accepted by your web browser. Most browsers offer instructions on how to reset the browser to reject cookies in the "Help" section of the toolbar. However, if you reject our cookies, many functions and conveniences of our Services may not work properly.

Analytics and Conversion Tracking:

We use analytics services that use cookies, javascript and similar technologies to help us analyze how users use the Service. The information generated by these services about your use of the Service (including your IP address or a truncated version of your IP address) is transmitted to and stored by analytics service providers on their servers. Those service providers will use this information for the purpose of evaluating your, and other users', use of the Service, compiling reports for us on website activity and providing other services relating to website activity and Internet usage.

We may collect information about your computer, including your IP address, operating system and browser type, for system administration and in order to create reports. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

We use cookies on our site for Google Analytics. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so that they can improve it.

Like many services, Google Analytics uses first-party cookies to track visitor interactions as in our case, where they are used to collect information about how visitors use our site. We then use the information to compile reports and to help us improve our site.

Cookies contain information that is transferred to your computer's hard drive. These cookies are used to store information, such as the time that

the current visit occurred, whether the visitor has been to the site before and what site referred the visitor to the web page.

Google Analytics collects information anonymously. It reports website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit <https://tools.google.com/dlpage/gaoptout>. We also use Google conversion tracking and/or similar services to help us understand your and other users' use of the Service.

Please see <https://support.google.com/adwords/answer/1722022?hl=en> for more information about conversion tracking provided by Google.

Security:

The security of your personal data is very important to us. When we collect your personal data online, we use reasonable efforts to protect it from unauthorized access. However, due to the inherent open nature of the Internet, we cannot guarantee that your personal data will be completely free from unauthorized access by third parties such as hackers and your use of our Service demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your personal data. For more information on protecting your privacy, please visit www.ftc.gov/privacy.

We shall investigate and report data breaches within 72 hours of becoming aware of such breach. When a breach of Personal Data is likely to result in a high risk to the rights and freedoms of individuals then Flowell, as Controller, will notify the affected individuals without undue delay.

Your Disclosures In Blogs And Other Social Media:

You should be aware that personal data which you voluntarily include and transmit online on the Service or in a publicly accessible blog, chat room, social media platform or otherwise online, or that you share in an open forum such as an in-person panel or survey, may be viewed and used by others without any restrictions. We are unable to control such uses of your personal data, and by using the Service or any other online

services you assume the risk that the personal data provided by you may be viewed and used by third parties for any number of purposes.

If you connect to a third party service such as Facebook or Twitter through an icon or link on the Service or otherwise link your Flowell account with a third party service, we may share the contents of your post and associated information (such as your user name, the fact that your connection originated from the Service, and other relevant usage and diagnostic information) with such third party. With your one-time consent, we may also send information about the content you watch and your activities on the Service to such third parties. Once such information is shared, the use of your information will be subject to that service's privacy policy and this Privacy Policy will not apply.

Protection for Children:

We generally do not collect personal data from children under the age of 13. If at any time in the future we plan to collect personal data from children under 13, such collection and use, to the extent applicable, shall, when required, be done in compliance with the Children's Online Privacy Protection Act ("COPPA") and appropriate consent from the child's parent or guardian will be sought where required by COPPA. When we become aware that personal data from a child under 13 has been collected without such child's parent or guardian's consent, we will use all reasonable efforts to delete such information from our database.

Other Services:

As a convenience to you, we may provide links to third-party services from within our Service. We are not responsible for the privacy practices or content of these third-party sites. When you link away from our Service, you do so at your own risk.

Changes to this Privacy Policy:

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. However, if at any time in the future we plan to use personal data in a way that materially differs from this Privacy Policy, including sharing such information with more third parties, we will email you and give you the opportunity to review the revised policy before you choose to continue using our Services.

User Access to Data:

You have the right to request access to the data information we have stored on you. You can do this by contacting us at support@flowell.co. We will make sure to provide you with a copy of the saved data particular to you. In order to comply with your request, we may ask you to verify your identity. We will fulfill your request by sending an electronic copy unless you expressly specify a different method of receipt.

Data Correction and Deletion:

If you believe the data Flowell has collected on you is incorrect, you are encouraged to contact us to update it. Any data that is no longer needed for the purposes specified in this Policy will be deleted. You may request to have your data updated or deleted at any point by emailing us at support@flowell.co.

Opt-Out Process:

All unsubscribe or opt-out requests may be made via email to support@flowell.co with the subject 'Unsubscribe from Emails' or by clicking the "unsubscribe" link at the bottom of the email. We will process your request within a reasonable time after receipt. However, we are not responsible for, and in some cases we are incapable of, removing your personal data from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy or your consent. You should contact such third parties directly. If you would like to update or correct any personal data that you have provided to us, please email us at support@flowell.co and once we confirm your information, we will update such information within a reasonable amount of time.

Communications with Flowell:

By providing your contact information through channels including but not limited to your email address and phone number (collectively the "Channels") to us, you expressly consent to receive communications from us. We may use the Channels to communicate with you, to send information that you have requested or to send information about other products or services developed or provided by us or our business partners, provided that, we will not give your contact information to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

By providing your phone number to us, you expressly consent to receive phone calls and/or text messages from us. We will not give your phone number to another party to promote their products or services directly to you without your consent or as set forth in this Privacy Policy.

Any phone calls and/or text messages delivered to your phone or device may cause you to incur extra data, text messaging, or other charges from your wireless carrier. MESSAGE AND DATA RATES MAY APPLY. You are solely responsible for any carrier charges incurred as a result of phone and/or text communications from Flowell.

By using the Service, you expressly consent to receive in-product communications from us (including, without limitation, push notifications on the App).

Any communication or material you transmit to us by email or otherwise, including any data, questions, comments, suggestions, or the like is, and will be treated as, non-confidential and nonproprietary. Except to the extent expressly covered by this Privacy Policy, anything you transmit or post may be used by us for any purpose, including but not limited to, reproduction, disclosure, transmission, publication, broadcast and posting. Furthermore, you expressly agree that we are free to use any ideas, concepts, know-how, or techniques contained in any communication you send to us, as well as any data developed using the content of such communication, without compensation and for any purpose whatsoever, including but not limited to, developing, manufacturing and marketing products and services using such information.

No Rights of Third Parties:

This Privacy Policy does not create rights enforceable by third parties, nor does it require disclosure of any personal data relating to users of the Service.

Site Terms of Use:

Use of this Service is governed by, and subject to, the Terms of Use located [here](#) (the "Terms"). This Privacy Policy is incorporated into the Terms. Your use, or access, of the Service constitutes your agreement to be bound by these provisions.

Servers:

Our servers are maintained in the United States. By using the Service, you freely and specifically give us your consent to export your personal data to the United States and to store and use it in the United States as specified in this Privacy Policy. You understand that data stored in the United States may be subject to lawful requests by the courts or law enforcement authorities in the United States.

Governing Law:

This Privacy Policy and our legal obligations hereunder are subject to the laws of Maryland, United States, regardless of your location. You hereby consent to the exclusive jurisdiction of and venue in the courts located in New York County, New York, United States, in all disputes arising out of or relating to the Service.

For EU Users:

We comply with the General Data Protection Regulation framework as set forth by the European Union regarding the collection, use, and retention of personal data from European Union member countries and Switzerland. Flowell has certified that it adheres to the requirements of notice, choice, onward transfer, security, data integrity, access and enforcement.

Contact:

For questions or concerns relating to privacy, we can be contacted at support@flowell.co.