

PRIVACY POLICY

Last Updated _____ 6/2/22 _____

The Site is designed and intended to be used by adult persons at least twenty-one (21) years of age. If you are not 21 years old or older, please leave this Site immediately.

Welcome to the website or application (the "**Site**") of [HEAVYWEIGHT HEADS. ("**Company**" "**we**," "**us**," or "**our**"). Company follows this privacy policy according to the applicable law in the places in which we operate. We also work collaboratively with other internet and computer and mobile applications which frequently have their own privacy statements and policies and we encourage you to review them. Please know that our site and applications may contain links to other sites we do not own or control but that you may find useful. Company is not responsible for the privacy practices of those sites.

This Privacy Policy gives you an overview of personal data we collect, the purpose for processing that information, how and why that information may be shared, and other privacy topics that relate to your personal data. In this Policy we summarize your choices concerning our data practices.

We do not, and without your consent will not sell, lease, or rent your information to third parties for monetary or other valuable consideration. You may exercise your right to be forgotten at any time by contacting us here [info@heavyweightheads.com]

We may use analytics software to improve our Users' experience with the Site such as "Google Analytics." This software may use or collect non-personal activity such as what pages a User viewed or how long a User viewed a page, the type of personal device a User used to access the Site, or some general geolocation information. No personal or identifiable information is used or collected by analytics software.

Before using this Site or submitting any personal data to us, please review this Privacy Policy carefully and [contact us](#) if you have any questions. By using the Service, you agree to the practices described in this Privacy Policy. If you do not agree to this Privacy Policy or are not over the age of thirteen, you may not access or use the Service.

1. DEFINITIONS

For the purposes of this Privacy Policy:

- **Account** means a unique account created for You to access our Service or parts of our Service.

- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where “control” means ownership of 50% or more of the shares, equity interest or other Application means the software program provided by the Company downloaded by You on any electronic device, named Company
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to [HEAVYWEIGHT HEADS]
- **Country** refers to: United States
- **Device** means any device that can access the Service such as a computer, a cellphone or a digital tablet.
- **Personal Data** is any information that relates to an identified or identifiable individual.
- **Service** refers to the Application.
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Third-party Social Media Service** refers to any application or website or any social network website through which “You” (defined below) or a User can log in or create an account to use the Service.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **You or User** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable. securities entitled to vote for election of directors or other managing authority. By using this site you are agreeing to our privacy policies and are confirming and representing that you are at least 21 years of age and are legally permitted to review the information on our Site or in our applications.

2. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect categories of personal data and information, the general purposes of which, include these (we sometimes refer to the personal data and information we collect as "Personal Data"):

Personal Data You Provide: Generally this data or information establishes your account, method/means of identifying institutions in your personal financial network, and potentially also your methods and means of payment, services and other data related to our relationship with you.

You may share this Personal Data when you visit the Site, register to use the Service, in connection with your use of the Service, and in other instances where you may provide it to us. The Personal Data collected during these interactions may vary based on what you choose to share with us and generally will fall into the categories described below.

User Data. It includes but may not be limited to this information:

- Your name, email address, mobile phone number, and physical address,
- If applicable, financial information and other Personal Data you provide us or enable us to access through third parties (discussed further [below](#)), which in some circumstances may include certain banking and financial information in connection with any Services fees, including as necessary to assure payments can be processed by our third party payment processors (however we will not store such data),
- And personal identifiers you may have such as your social security number and/or state/governmental identifiers, driver's license numbers or other government issued identification numbers, date of birth, age, gender, and other personal details you choose to share with us that may be necessary to verify your age and identity and/or provide other services unique to you and your preferences.

Administrative Data. This information may include device and system information, product license information, and/or usage and preference information including how you want us to communicate with you. This data helps us to understand and best serve your expectations, needs, interests and requirements.

Security Data. This data may include specifics about your financial accounts or transactions, location data and other information you provide to organize your personal financial network. Any data we collect is stored in secure systems. Our Site is running on a secure, encrypted network, so your data is safe during transmission. We encourage you to use complex passwords or other unique credentials to access the Site and we discourage you from sharing your unique credentials with other persons.

Diagnostic Information. If and as you use our Services and platform we may capture and preserve application crash reports, information you share regarding your customer experience as necessary to troubleshoot any malfunctioning Services. For example, when you call, in message, chat, email, or otherwise communicate with us, we may retain and review recordings and records and the

contents of the communications as required or permitted by law and our recording and information management policies.

Data We Receive Automatically From Your Use of the Service: When you visit, use or interact with the Service, we may receive certain information about your visit, use or interactions. For example, we may monitor the number of people that visit the Service, peak hours of visits, which page(s) are visited, the domains our visitors come from (e.g., google.com, yahoo.com, etc.), and which browsers people use to access the Service (e.g., Google Chrome, Microsoft Internet Explorer, etc.), and geographical location information. In particular, the following information may be created and automatically logged in our systems:

- **Log data:** Information that your browser automatically sends whenever you visit the Service ("log data"). Log data includes your Internet Protocol address, browser type and settings, the date and time of your request, and how you interacted with the Service.
- **Cookies:** Please see the "[Cookies](#)" section below to learn more about how we use cookies.
- **Device information:** Includes name of the device, operating system, and browser you are using. Information collected may depend on the type of device you use and its settings.
- **Usage Information:** We collect information about how you use our Service, such as the types of content that you view or engage with, the features you use, the actions you take, and the time, frequency and duration of your activities.

Cookies: We use cookies to operate and administer our Service, gather usage data on our Service and improve your experience on it. A "cookie" is a piece of information sent to your browser by a website you visit. Cookies can be stored on your computer for different periods of time. Some cookies expire after a certain amount of time, or upon logging out (session cookies), others survive after your browser is closed until a defined expiration date set in the cookie (as determined by the third party placing it), and help recognize your computer when you open your browser and browse the Internet again (persistent cookies). For more details on cookies please visit [All About Cookies](#).

Analytics: We may use certain third party analytics providers, including Google Analytics, a web analytics service provided by Google, Inc. ("**Google**"). Google Analytics uses cookies to help us analyze how users use the Service and enhance your experience when you use the Service. For more information on how Google uses this data, go to www.google.com/policies/privacy/partners/.

Online Tracking and Do Not Track Signals: We and our third party service providers, including Facebook, may use cookies, pixels or other tracking technologies to collect information about your browsing activities over time and across different websites following your use of the Service and use that information to send targeted advertisements. Our Service currently does not respond to "Do Not Track" ("**DNT**") signals and operates as described in this Privacy Policy whether or not a DNT signal is received. If we do respond to DNT signals in the future, we will update this Privacy Policy to describe how we do so.

Your Choices: On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off or otherwise manage them. Company has no control over your choice of browser or the policies and practices of the browser companies. Please assure you review any browser companies’ own policies and procedures. For your convenience here are links to a number of browser companies where you can review the policies and procedures each has:

- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Google Chrome](#)
- [Apple Safari](#)

Please note that if you limit the ability of websites to set cookies, you may be unable to access certain parts of the Service and the choices you make about setting cookies may have an impact on the scope of functions associated with features of the Service you are able to access.

Advertising networks unrelated in any way to Company may collect Personal Data through the use of cookies. Should you desire to opt in or out of advertising preferences, review the unique privacy policies and procedures of your browser or website or the Network Advertising Initiative’s online resources at <http://www.networkadvertising.org>. [You will be able to review opt-in and opt-out instructions there as well as other information about those unrelated sites’ and networks’ privacy statements.](#) Company has no relationship of any sort to any of these sites or resources and notes them here solely for your convenience.

If you access the Service on your mobile device, the configuration of the applications or technology on your mobile device may, through no control of Company, limit your opportunities to control tracking, advertising or other settings.

1. HOW WE USE PERSONAL DATA

Consistent with applicable law and choices and controls that may be available to you, we may use all or some of the Personal Data we collect from you or from devices associated with you, for purposes including the following:

- To personalize content and your experience;
- To provide and facilitate your engagement with the Service, including to verify your identity and facilitate communications and payments between you and third-party financial institutions via our platform;
- To respond to your inquiries, comments, feedback or questions;
- To send administrative information to you, for example, information regarding the Service, and changes to our terms, conditions, and policies;
- To send you offers and promotions for our products and Services or third-party products and services;
- To analyze how you interact with our Service;
- To maintain and improve the content and functionality of the Service and to troubleshoot any issues you or other users may report to us;
- To develop new products and services;

- To prevent fraud, criminal activity, or misuse of our Service, and to assure the security of our IT systems, architecture and networks; and
- To comply with our legal obligations and legal process and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or other third parties.

Aggregated or Anonymized Information. We may collect or generate aggregated and/or anonymized Personal Data and use the aggregated and/or anonymized information to analyze the effectiveness of our Service, to improve and add features to our Service, and for any other lawful purpose. In addition, we may share aggregated and/or anonymized information with our business partners and other third parties. We may collect or generate aggregated and/or anonymized information through the Service, through cookies, and through other means described in this Privacy Policy.

Marketing. By providing your contact information to us you are giving us permission to use your Personal Data to contact you to tell you about products or services we believe may be of interest to you. For instance, if you elect to provide your email or telephone number, we may use that information to send you special offers. You may opt out of receiving marketing emails at any time by following the instructions contained in each promotional email we send you. You can also change your permissions regarding marketing emails and/or text messages you receive by updating your settings through your account. In addition, if at any time you do not wish to receive future marketing communications, you may [contact us](#). If you unsubscribe from our marketing lists you will no longer receive marketing communications, but we will continue to contact you regarding management of your account, other administrative matters, and to respond to your requests. Please understand that any changes in your communication preferences will take effect prospectively and will be processed within a reasonable timeframe after you contact us to notify us regarding a change. We may use a third party resource to email you from time to time such as MailChimp and we encourage you to review Mail Chimp's privacy practices and data security standards.

2. SHARING AND DISCLOSURE OF PERSONAL DATA

Our platform is designed to facilitate communications between you and financial institutions you tell us about that are in your personal financial network. Accordingly, we will share your Personal Data with those financial institutions in accordance with your use of our Service, including to facilitate payments from you to such financial institutions. In certain circumstances we may share your Personal Data with third parties, subject to applicable laws, as set forth below:

- **Vendors and Service Providers:** To assist us in meeting business operations needs and to perform certain services and functions, we may share Personal Data with vendors and service providers we contract with or coordinate with, including providers of hosting services, cloud services and other information technology services providers, event management services, email communication software and email newsletter services, advertising and marketing services, payment processors, and banking, credit or financial service providers, customer relationship management and

customer support services, and web analytics services (for more details on the third parties that place cookies through the Service, please see the "[Cookies](#)" section above). Pursuant to our instructions, these parties will access, process or store Personal Data in the course of performing their duties to us. We take commercially reasonable steps to ensure our service providers adhere to the [security standards](#) we apply to your Personal Data.

- **Companies You Select:** If you direct us to share your Personal Data with another company, by electing to share your personal information with others to fulfill your request, we will share your Personal Data and once shared it will be subject to the privacy policies and practices of those other companies.
- **Business Transfers:** If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of all or a portion of our assets, or transition of service to another provider, your Personal Data and other information may be shared in the diligence process with counterparties and others assisting with the transaction and transferred to a successor or affiliate as part of that transaction along with other assets.
- **Legal Requirements:** If required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, including to meet national security or law enforcement requirements, (ii) protect and defend our rights or property, (iii) prevent fraud, (iv) act in urgent circumstances to protect the personal safety of users of the Service, or the public, or (v) protect against legal liability.
- **Affiliates:** We may share Personal Data with our affiliates, meaning an entity that controls, is controlled by, or is under common control with Company. Our affiliates may use the Personal Data we share in a manner consistent with this Privacy Policy.

3. DATA RETENTION, STORAGE AND PROCESSING.

We keep Personal Data for as long as reasonably necessary for the purposes described in this Privacy Policy, while we have a business need to do so, or as required by law (e.g. for tax, legal, accounting or other purposes), whichever is longer. Whenever your Personal Data is transferred, stored or processed by us, we will take reasonable steps to safeguard the privacy of your personal information. These steps may include implementing standard contractual clauses with third parties, encouraging you to review the privacy statement of other companies you direct us to share your information with, and if required by law, obtaining your consent or other lawful approval of transferring your information.

4. UPDATE YOUR INFORMATION

Please log in to your account or [contact us](#) if you need to change or correct your Personal Data.

5. CHILDREN

Our Service is not directed to children who are under the age of 18. Company does not knowingly collect Personal Data from children under the age of 18. If you have reason to believe that a child under the age of 18 has provided Personal Data to us

through the Service please [contact us](#) and we will endeavor to delete that information from our databases.

6. LINKS TO OTHER WEBSITES AND THIRD PARTY FUNCTIONALITY

The Service may contain links to other websites or applications, or other functionality or integrations not operated or controlled by Company, including certain banking or financial services ("**Third Party Services**"). You will generally have discretion and control over the Third Party Services with whom you elect to interact and share your Personal Data, except as otherwise provided in this Privacy Policy. These Third Party Services may include certain API finance solutions, such as Plaid Technologies, Inc. ("**Plaid**"). The information that you share with Third Party Services will be governed by the specific privacy policies and terms of service of the Third Party Services and not by this Privacy Policy. By providing these links we do not endorse their policies or practices, are not recommending them to you, nor have we reviewed these Third Party services. Please contact the Third Party Services directly for information on their privacy practices and policies. Should you believe you have concerns with the actions or inactions of Third Party Services we encourage you to report your concerns directly to those Third Party Services.

7. SECURITY

You use the Service at your own risk. We implement reasonable technical, administrative, and organizational measures designed to protect Personal Data both online and offline from loss, misuse, and unauthorized access, disclosure, alteration or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent to or from us may not be secure. Therefore, you should take special care in deciding what information you send to us via the Service or e-mail. Please keep this in mind when disclosing any Personal Data to Company via the Internet. In addition, we are not responsible for circumvention of any privacy settings or security measures contained on the Service, or third party websites. You must [contact us](#) if you suspect any information or the Service has been misused or if you notice anything suspicious happening while you use the Service.

8. YOUR CHOICES

In certain circumstances providing Personal Data is optional. However, if you choose not to provide Personal Data that is needed to verify your age, identity or to use some features of our Service, those features of our Services may be unavailable to you. You can also [contact us](#) to ask us any questions, make recommendations, or to seek assistance in updating or correcting your Personal Data.

9. CHANGES TO THE PRIVACY POLICY

The Service, and our business may change from time to time. As a result, we may change this Privacy Policy at any time. When we do, we will post an updated version on this page noting the revision date, unless another type of notice is required by the applicable law. Your continued use of our Service, including by way of example but not limitation, providing us with Personal Data after we post an update Privacy Policy, or notified you by other means if applicable, shall be

regarded as your consent to revisions to our Privacy Policy and practices related to it.

10.CONTACT US

If you have any questions about our Privacy Policy or information practices, please contact us at info@heavyweightheads.com.

11.CALIFORNIA RESIDENTS' RIGHTS

Notice to California Residents: If you are a California resident, you may have certain additional privacy rights that are described in more detail here [make hyperlink]

Text for California Privacy Rights hyperlink:

Special notice for California residents:

If you are a California resident, California Civil Code Section 1798.83, the California Consumer Privacy Act or "CCPA" permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes. We take great pride in our relationship of trust with you and are dedicated to treating your Personal Data with care and respect. Pursuant to California Civil Code Section 1798.83(c)(2) we do not share your personal information with others outside of Company for those parties' direct marketing use unless you elect that we do so." If you have any questions about our California Privacy Policy, please feel free to contact us at info@heavyweightheads.com.

Effective January 1, 2020, the CCPA allows California residents, upon a verifiable consumer request, to request that a business that collects consumers' personal information to give consumers access, in a portable and (if technically feasible) readily usable form, to the specific pieces and categories of personal information that the business has collected about the consumer, the categories of sources for that information, the business or commercial purposes for collecting the information, and the categories of third parties with which the information was shared. California residents also have the right to submit a request for deletion of information under certain circumstances. Consistent with California law, if you choose to exercise your rights, we won't charge you different prices or provide different quality of services unless those differences are related to your information.

We do not sell your personal information.

We disclose personal information for business purposes.

From businesses that disclose personal information for a business purpose, you have the right to request:

- (1) The categories of personal information that the business collected about you; and
- (2) The categories of personal information that the business disclosed about you for a business purpose.

The right to request the business to delete the personal information it has collected from you, subject to certain legal exceptions, for example, when the personal information is necessary to complete a transaction for which we collected it or to comply with a legal obligation.

The right to be protected from discrimination for exercising your CCPA rights. Businesses are prohibited from discriminating against you for exercising your rights under the statute, including by: (A) denying you goods or services; (B) charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; (C) providing you with a different level or quality of goods or services; or (D) suggesting that you will receive a different price, rate, level, or quality of goods or services. Nothing prohibits a business from charging a different price or providing a different level or quality of service if the difference is reasonably related to the value provided to the consumer by the consumer's data.

Submitting a Request

To submit a request under the CCPA, please contact info@heavyweightheads.com. You may be asked to verify your identity in order for us to process your request, including by:

- Confirming that certain pieces of your personal information match the member information that we have on file;
- Submitting identity verification documents, such as a copy of your government issued identification; and/or
- Logging into your Company account.

If you are using an authorized agent to submit a request on your behalf, we ask that you:

- Provide written authorization of the agent's authority to act on your behalf that is signed by you;
- Verify your identity directly with us through any of the methods outlined above; and/or
- Directly confirm that your authorized agent has permission to submit your request.

To protect your privacy, your request may be denied if we are unable to verify your identity, or your agent's authorization to act on your behalf.

Please note that Company may comply with CCPA through one or more legal exemptions applicable to certain types of personal information.

Additional Disclosures Under the CCPA

Company does not sell your personal information to third parties (as those terms are defined under the CCPA). However, as outlined in this policy, we do allow third parties to collect personal information through our services and share personal information with third parties for the business purposes we've described here. For more information, please refer to the "What Information We Collect" and "When We Share the Information We Collect" sections of the Privacy Policy.

List of categories of personal information collected about consumers and disclosed for a **business purpose** (we explain below what "business purpose means):

- **Information you provide to us.** This includes the information you provide when you register as a member, such as your date of birth and identifiers including first name, last name, and email address, information you provide when you complete an application for credit products or services on our Site, and information you provide when you submit information in forms or through other features of our Services, from which we may make inferences.
- **Information we automatically collect.** We also collect information about how you access and interact with our Services. This includes device information, log information, geolocation information, and Internet or other electronic network activity information collected through technologies like cookies, web beacons, and browser web storage.
- **Information third parties provide about you.** In order to provide our Services, we may collect information about you from third parties.

Business purpose(s) when used here means and can include such things as these: providing our Services, maintaining and servicing accounts, providing customer service, processing or fulfilling orders and transactions, performing analytics and quality control, auditing transactions, researching and testing features and improvements, detecting and preventing fraud and security incidents, debugging or repairing technical errors, and marketing our Services.

For additional information on any of the above or if you wish to exercise one or more of your rights under the CCPA, please contact info@heavyweightheads.com.