

# TrainingPeaks Privacy Policy

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## **1. WHO WE ARE**

TrainingPeaks, LLC (“TrainingPeaks”, “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we may collect, use and safeguard the information you provide to us in using our websites and our mobile applications that link to this Privacy Policy, including but not limited to, the TrainingPeaks, TrainingPeaks Virtual, and TrainingPeaks Virtual Hub websites and applications, and the Run with Hal application (the “Sites”) and the services and features directed to coaches, sport enthusiasts, and athletes provided through our Sites (the “Services”).

TrainingPeaks' offices are located at 285 Century Place, Louisville, CO 80027, United States of America. TrainingPeaks is the data controller of all Personal Data collected from residents of the European Economic Area or the United Kingdom.

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage with a new "last updated" date. If we make material changes, we will provide you with additional notice, such as adding a statement on the homepages of our Sites or sending you a notification. Please review this Privacy Policy periodically.

## 2. HOW TO CONTACT US

For questions or concerns about our privacy policies or practices, please contact us at:

TrainingPeaks, LLC  
Attn: Privacy Team  
285 Century Place, Louisville, CO 80027  
United States of America  
Visit us at [support.trainingpeaks.com](https://support.trainingpeaks.com)  
Email us at [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com)  
Call us toll-free (for the U.S.A.): 1-877-201-1552

## 3. PERSONAL DATA WE COLLECT

We collect Personal Data from you through your use of the Sites and Services. Personal Data is information that is linked or reasonably linkable to an identified or identifiable individual. Depending on how you interact with our Sites and Services, we will collect the following Personal Data that you voluntarily provide to us for the following purposes:

### Personal Data You Provide Directly to Us

- *Create an Account.* If you create an account, you may provide us with your name, email address, gender, date of birth, username, and password.
- *Login.* When you sign into your account, you will provide us with your email address, username, password, or information relating to a single sign on service like Google SSO.
- *Managing Profile.* When you manage your account, you may provide us with your age, height, weight, photos, country of residence, competitive license information, geo-location information, training information, activity information, challenge information, training preferences, such as functional threshold power preferences, and other fitness information.
- *Managing Training Plans and Using Fitness Services.* When you manage training plans or use other fitness services through your account, you may provide us with your training information, including your training plans, schedule, goals, workouts, events, and activity information, including your equipment usage, challenge information, workout progress, injury or physical limitation information, workout performance, power, heart rate,

cadence, functional threshold power preferences, geo-location information, videos you record, and other fitness information.

- *Connecting Apps & Devices.* When you connect an application or devices, such as an Apple Watch or Garmin device with our Services to capture health data, track your activity, or utilize other similar features available on your device, you will provide us with information about the device and may choose to share additional device information with us.
- *Social Features.* When you use certain public facing or social features of our Services, such as when you use the TrainingPeaks Virtual app or TrainingPeaks Virtual Hub to engage in public online virtual events, you may provide us with your name, username, email address, gender, age, country of residence, training information, activity information, including your power, cadence, heart rate, progress, performance, and other in-Service or in-app activities performed by you.
- *Orders.* If you place an order for a training plan, subscribe to a service, hire a coach, or purchase another service, you will provide us with your name, address, and your credit or debit card information.
- *Contact Us or a Coach.* If you contact us, our help center, or a coach, you may provide your coach or us with your name, email address, username, telephone number, and any additional information you choose to provide.
- *Sign Up for Email.* If you sign up to receive emails from us, you will provide us with your email address. To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails or by adjusting your marketing preferences in our in-application settings. You also may submit a request to us at [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com).
- *Submit a Blog or Forum Post.* You may share information with us for the purposes of creating a post on our blogs or posting on our forums.

### **Personal Data We Collect Via Tracking Technology**

We automatically collect certain Personal Data through your use of our Sites and our use of cookies and other tracking technologies, such as the following:

- *Usage Information.* For example, the pages on the Sites you access, the frequency of access, and what you click on while on the Sites.
- *Device Information.* Browser type and version, language, time zone, operating system and version, location.
- *Mobile Device Information.* Aggregated information about whether the Sites are accessed via a mobile device or tablet, the device type, and the carrier.

For more information on our cookie usage see our “**COOKIES AND OTHER TRACKING TECHNOLOGIES**” section below.

### **Personal Data We Collect About You from Other Sources**

In some cases, we may receive Personal Data about you from other sources. This includes operating systems and platforms and coaches or sponsors you hire or work with as part of training programs.

### **Non-Identifiable Information**

We collect and use non-personally identifiable user information (“Non-PII”) for several purposes, including (without limitation): (i) to calculate necessary royalty payments to third party content providers, which are often based on the number of times a work is opened or accessed by our users; (ii) to prepare reports and other materials that we may share with others in an anonymous format; and (iii) for analytics purposes. In some instances, we use third-party vendors to collect, monitor and/or maintain Non-PII. For example, we utilize [Rollbar](#), [Google SSO](#) and [Google Analytics](#). Rollbar is utilized for error monitoring. Information logged includes common request data. Google Analytics is utilized to analyze application, feature and content usage.

## **4. WHY WE COLLECT YOUR PERSONAL DATA**

In addition to the purposes stated above, we may use all the Personal Data we collect in accordance with applicable law such as to:

- Communicate with you;
- Process your account registration;
- Maintain your account and provide you with access to our Sites and Services;
- Contact you regarding any account issues;
- Provide you with information and offers;
- Allow you to participate in features, demos and programs we offer on the Sites and Services including features that allow you to publicly interact with other users;
- Connect you with coaches;
- Troubleshoot and provide you with support;
- Provide educational workshops, webinars and other material;
- Personalize, enhance, an/or tailor your experience on our Sites and using our Services;
- Develop new features, products and Services;
- Integrate with third party and other TrainingPeaks applications;
- Analyze and improve our Sites and Services;
- Tailor our content, advertisements and offers;
- Measure the performance of our Sites and Services;
- Provide information about data privacy and security;
- Assist with ensuring the security and integrity of the Sites and Services;
- Investigate, prevent or take action regarding illegal activities, suspected fraud or violations of our [Terms of Use](#);
- Efficiently maintain our business;

- Comply with applicable law; and
- Defend our legal rights and the rights of others.

## 5. HOW WE DISCLOSE YOUR PERSONAL DATA

We may share the Personal Data that we collect about you in the following ways:

**With Service Providers.** We may share information with service providers who provide or perform:

- Data services on our behalf, such as hosting and cloud storage services, and data warehousing;
- Project management and workflow management services;
- Marketing services for us;
- Fitness, biometric, geolocation data to third party app providers;
- Defect-tracking services, database and/or monitoring services, and error monitoring services;
- Messaging and notification services, customer feedback services, and customer support service;
- Analytics and visualization services, data pooling services, and data transfer services;
- Other services on our behalf, such as feature-flag services, and accounting and tax software services;
- Other general services such as documentation software and usability testing; or
- Payment information on our behalf.

**With Our API Partners.** We make our Sites and Services compatible with hundreds of devices, mobile apps and third party software that you can choose to connect with. Examples include (without limitation) Garmin, Suunto, Polar, Wahoo, Zwift and Apple Health. For more information on our compatibility options and API partners, [visit this page on the TrainingPeaks Help Center](#).

**To Meet Our Legal Requirements or Exercise Our Rights.** We may share information with third parties in the following instances:

- When we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- When we reasonably believe it is appropriate to apply to a court or other competent authority for disclosure of that Personal Data where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personal Data; or
- We may share information with other persons or entities as part of our own corporate transactions, such as during financing or any asset sale.

**With Third Party Coaches and Sponsors.** We may share your Personal Data with third party Coaches and Sponsors with whom you are associated through our Services, including athletic

data. Coaches and Sponsors are not under our control. We accept no responsibility or liability for these Coaches or Sponsors.

**With Other Users.** We may make some of your Personal Data available to other users of our Services when necessary as part of your participation in a Site or Service which includes interactions with other users. For instance, when you use features such as joining a TrainingPeaks Virtual race event or allow other users to follow you as a friend, your username, country of location, and other Personal Data may be visible to other users. We accept no responsibility or liability for these users in how they may use or share that information.

**At Your Request.** We may share your Personal Data when you request or consent to the disclosure.

## **6. COOKIES AND OTHER TRACKING TECHNOLOGIES**

Like many other companies, we use Cookies and other tracking technologies (collectively, “Cookies”). Cookies are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We use Cookies to: (a) estimate audience size and usage patterns; (b) understand and save your preferences for future visits, allowing us to customize the Sites and Services to your individual needs; (c) advertise new content and Services that relate to your interests; (d) keep track of advertisements and search engine results; (e) compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and (f) recognize when you return to the Sites.

We set some Cookies ourselves, while separate entities set other Cookies. We use Cookies other entities set to provide us with useful information, to help us improve our Sites and Services, to conduct advertising, and to analyze the effectiveness of advertising. For example, we use Cookies from Google, Facebook and other similar companies.

### **How You Can Opt Out of Cookies**

#### *Your Preferences*

If you wish to manage your Cookies, you can do so by navigating to <https://www.trainingpeaks.com> and clicking on “Manage Cookie Preferences”.

#### *Browser Settings*

You can control the use of Cookies at the browser level by setting your web browser controls to accept or refuse cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Sites and Service.

You can find out more about Cookies and how to manage them by visiting [www.AboutCookies.org](http://www.AboutCookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### *Platform Controls*

You can opt out of Cookies set by specific entities by following the instructions found at these links:

- Facebook: <https://www.facebook.com/about/ads>
- Google: <https://adssettings.google.com>
- Microsoft: <https://account.microsoft.com/privacy/ad-settings/>
- X.com: <https://help.x.com/en/personalization-data-settings>

You can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt out of some of those Cookies by accessing the [Network Advertising Initiative's website](#) or the [Digital Advertising Alliance's website](#). For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative's Mobile Choices website](#).

Please note these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

### **Google Analytics**

We use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics uses Cookies to help us analyze how users interact with the Sites and Services, compile reports on their activity, and provide other services related to their activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a returning visitor, and any referring website. The information generated by Google Analytics will be transmitted to and stored by Google and will be subject to Google's [privacy policies](#). To learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google, click [here](#).

### **Hotjar**

We use Hotjar to better understand our users' needs and to optimize the service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g., how much time they spend on which pages, which links they choose to click, what users do and do not like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses Cookies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our Sites. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For more information, please view Hotjar's privacy page by clicking [here](#).

### **Other Types of Collecting Activities**

The Sites and Services may use Cookies third-party vendors provide to collect information on user behavior (e.g., screens and pages visited, buttons and links clicked, limited information entered, and user taps and mouse movements). This information enables us to monitor and improve the user experience.

## **7. OPT-OUT PREFERENCE SIGNALS**

The Sites recognizes the Global Privacy Control (“GPC”) signal. If you are using a browser setting or plug-in that sends an opt-out preference signal to each website you visit, we will treat that as a valid request to opt out. To download and use a browser supporting the GPC browser signal, click here: <https://globalprivacycontrol.org/orgs>. If you choose to use the GPC signal, you will need to turn it on for each supported browser or browser extension you use.

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Sites do not currently interpret, respond to or alter their practices when they receive “Do Not Track” signals.

## **8. INTERNATIONAL DATA TRANSFERS**

Some of our Sites may operate internationally and transfer information to the United States for the purposes described in this policy. The United States may have privacy and data protection laws that differ from, and are potentially less protective than, the laws of your country. Your Personal Data can be subject to access requests from governments, courts, or law enforcement in the United States according to the laws of the United States.

For any transfers of Personal Data from the European Economic Area (EEA), Switzerland or the United Kingdom that we make to other entities as described in this Privacy Policy, we use appropriate safeguards to ensure for the lawful processing and transfer of the Personal Data, including, when appropriate, the use of standard contractual clauses approved by the European Commission. To obtain a copy of the safeguards, contact us at [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com).

## **9. SECURITY**

We take industry standard security measures to protect your information. We also have put into place appropriate agreements and/or procedures with our service providers to ensure that your Personal Data is treated consistent with applicable data privacy and security laws. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot and do not guarantee the security of your data.

## **10. LINKS TO THIRD-PARTY SITES**

Our Sites may contain links to other websites and companies that may be of interest to you. If you click on any of those links, you will leave our Sites. We are not responsible for third-party websites. Therefore, please consult the terms of service and privacy policies of those sites when you visit them.

## 11. DATA RETENTION

We will store your Personal Data for as long as: (a) you maintain an account with us; (b) you continue using our Sites and Services; (c) your Personal Data is stored in our backup servers and/or services; (d) in accordance with our retention policies and schedules; and (e) as long as we are legally required to retain the Personal Data. Data can be deleted upon request.

## 12. COMMITMENT TO CHILDREN'S PRIVACY

In compliance with applicable law and our company practices, we do not knowingly collect Personal Data directly from children under 16 years of age without first obtaining consent from a parent or legal guardian. We permit parents and legal guardians of children under 16 years of age to contact us to request (1) what Personal Data we have about their child, (2) that we correct any incorrect Personal Data, (3) that we delete the Personal Data of their child, and/or (4) that we cease further collection or use of any Personal Data from their child. We do not sell the Personal Data of children under 16 years old.

## 13. YOUR STATE PRIVACY RIGHTS AND ADDITIONAL DISCLOSURES

Depending on the state in which you reside, you may have certain privacy rights regarding your personal data. If you are a California resident, please see our “**NOTICE TO CALIFORNIA RESIDENTS**” section below. For other state residents, your privacy rights may include (if applicable):

- The right to confirm whether or not we are processing your personal data and to access such personal data and the categories of personal data we are processing or have processed;
- The right to obtain a copy of your personal data that we collected from and/or about you in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another controller without hindrance, where the processing is carried out by automated means;
- The right, at our option, to obtain a list of specific third parties, other than natural persons, to which we have disclosed your personal data or any personal data;
- The right to delete personal data that we collected from and/or about you, subject to certain exceptions;
- The right to correct inaccurate personal data that we maintain about you, subject to certain exceptions;
- The right, if applicable, to opt out of the processing of your personal data for purposes of (1) targeted advertising; (2) the “sale” of your personal data (as that term is defined by

applicable law); and (3) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you;

- If we are required by applicable law to obtain your consent to process sensitive personal data, the right to withdraw your consent; and
- The right not to receive discriminatory treatment by us for the exercise of your privacy rights.

Depending on how the applicable privacy law defines a “sale,” we may sell personal data to third parties. For instance, if you are a resident of Colorado, our use of cookies and tracking technologies constitutes a sale of personal data to third-party advertisers. We also use Cookies to display advertisements about our products to you on nonaffiliated websites, applications, and online services. This is “targeted advertising” under applicable privacy laws. We do not use personal data for profiling in furtherance of decisions that produce legal or similarly significant effects concerning individuals.

To exercise your rights, please submit a request through our interactive Privacy Request Form available [here](#), by emailing us at [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com) or by calling us at 1-877-8201-1552. If legally required, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the individual on whose behalf you are making such request. To do so, we will ask you to verify data points based on information we have in our records. If you are submitting an opt-out request on behalf of another individual, please use the same contact methods described above. We will process authorized agent requests in accordance with applicable law. If we refuse to take action regarding your request, you may appeal our decision by replying to the email you received from us in response to your request. If you would like to opt out of targeted advertising, you may alter your cookie preferences by going to <https://www.trainingpeaks.com> and clicking on “Manage Cookie Preferences”.

## 14. NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”), requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, sale, sharing, and retention of personal information and of the rights of California residents regarding their personal information. This section of the Privacy Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this section does not apply to you, and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information or lawfully obtained, truthful information that is a matter of public concern. For purposes of this “NOTICE TO CALIFORNIA RESIDENTS” section we will refer to this information as “Personal Information.”

If you are a California resident and a current or former employee, job applicant, or independent contractor of ours, please see our [Privacy Policy for California Employees, Former Employees & Job Applicants](#) for more information on our collection and use of your Personal Information in that capacity.

### **Notice at Collection of Personal Information**

We currently collect and, in the 12 months prior to the Last Updated Date of this Privacy Policy, have collected the following categories of Personal Information:

- Identifiers (name, alias, online identifier, Internet Protocol address, email address, account name, other similar identifiers)
- Unique personal identifiers (cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology)
- Personal information described in California's Customer Records statute (California Civil Code § 1798.80(e)) (physical characteristics or description, telephone number, credit card number, debit card number, or any other financial information, medical information, as well as the categories listed in "Identifiers" category above)
- Commercial information (records of products or services purchased, obtained or considered; or other commercial information)
- Internet or other electronic network activity information (browsing history; search history; and information regarding consumer's interaction with website, application or advertisement)
- Geolocation data
- Biometric information (health or exercise data that contain identifying information)
- Audio electronic, visual, thermal, olfactory, or similar information

We collect Personal Information directly from California residents, your devices, from coaches and sponsors, and from our service providers described in above. We do not collect all categories of Personal Information from each source.

In addition to the purposes stated above in the section "**WHY WE COLLECT YOUR PERSONAL DATA**" we currently collect and have collected the above categories of Personal Information for the following business or commercial purposes:

- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards
- Helping to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of your current interaction with us, provided that your Personal Information is not disclosed to another third party and is not used to build a profile about you or otherwise alter your experience outside the current interaction with us
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information,

processing payments, providing financing, providing analytic services, providing storage, or providing similar services

- Providing advertising and marketing services, except for cross-context behavioral advertising, to you for the purpose of advertising and marketing, our service providers and/or contractors shall not combine the Personal Information of opted-out consumers that the service provider or contractor receives from us, or on our behalf with Personal Information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with you
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us
- Advancing our commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

### **Sale, Sharing, and Disclosure of Personal Information**

The CCPA defines “sale” as the transfer of Personal Information for monetary or other valuable consideration. Although we do not “sell” Personal Information as that term may be commonly interpreted, we engage in online activities that may constitute a sale or a share of Personal Information under California law. This may include showing you advertisements on other websites.

The following table identifies the categories of Personal Information that we sold or shared to third parties in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the categories of third parties to whom we sold or shared Personal Information:

| <b>Category of Personal Information</b>                                                                                                                                                                              | <b>Categories of Third Parties</b>      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|
| Unique personal identifiers (such as browser information, IP address, date and time of visit, device identifiers, unique user IDs, cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology) | Advertising networks/service providers. |

We sold or shared Personal Information to third parties to advance our commercial and economic interests.

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated Date of this Privacy Policy and, for each category, the categories of recipients to whom we disclosed Personal Information:

| <b>Category of Personal Information</b>                                                                                                                                                          | <b>Categories of Recipients</b>                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers (name, alias, account name, email address, Internet Protocol address, online identifiers, other similar identifiers)                                                                 | Coaches; other app providers; data hosting and cloud storage providers; mailing providers; accounting and billing service providers; client relationship management service providers; payment processing vendors.           |
| Unique personal identifiers (cookies, beacons, pixel tags, mobile ad identifiers, or other similar technology)                                                                                   | Data hosting and cloud storage providers; advertising service providers; cookie and privacy management provider; client relationship management service providers.                                                           |
| Physical characteristics or description                                                                                                                                                          | Coaches; other app providers; data hosting and cloud storage providers; client relationship management service providers.                                                                                                    |
| Telephone number                                                                                                                                                                                 | Coaches; client relationship management service providers; data hosting and cloud storage providers.                                                                                                                         |
| Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account            | Client relationship management service providers; security, anti-fraud, and verification providers; data hosting and cloud service providers; payment processing vendors.                                                    |
| Internet or other electronic network activity information (browsing history; search history; and information regarding an individual's interaction with a website, application or advertisement) | Data hosting and cloud storage providers; cookie and privacy management provider; error logging provider; website hosting providers; advertising service providers.                                                          |
| Commercial information (records of products or services purchased, obtained, or considered, or other commercial information)                                                                     | Coaches; data hosting and cloud storage providers; mailing providers; accounting and billing service providers; advertising service providers; client relationship management service providers; payment processing vendors. |
| Geolocation data                                                                                                                                                                                 | Coaches; other app providers (if you share it); data hosting and cloud storage providers; client relationship management service providers.                                                                                  |
| Biometric data                                                                                                                                                                                   | Coaches; other app providers (if you share it); data hosting and cloud storage providers; client relationship management service providers.                                                                                  |

|                                                                                                                   |                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Audio, electronic, visual, or similar information that is linked or reasonably linkable to an individual (photos) | Coaches; other app providers (if you share it); data hosting and cloud storage providers; client relationship management service providers. |
|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|

We disclosed Personal Information for all of the business and commercial purposes listed above.

We do not knowingly collect, sell, or share the Personal Information of consumers under 16 years of age. We do not collect or process sensitive Personal Information for the purpose of inferring characteristics about individuals and, consequently, do not collect sensitive Personal Information or use it for purposes other than those allowed by the CCPA and its regulations.

### **Retention of Personal Information**

We retain your Personal Information for as long as necessary to fulfill the purposes for which we collect it, such as to provide you with the service you have requested, and for the purpose of satisfying any legal, accounting, contractual, or reporting requirements that apply to us.

### **Your Rights**

If you are a California resident, you have the following rights with respect to your Personal Information:

|                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>RIGHT TO KNOW</b>                       | You have the right to request that we disclose to you the Personal Information we collected about you in the 12-month period preceding your request. This right includes the right to request: (1) specific pieces of Personal Information we have collected about you; (2) categories of Personal Information we have collected about you; (3) categories of sources from which the Personal Information was collected; (4) categories of Personal Information that we sold or disclosed for a business purpose about you (if applicable); (5) categories of third parties to whom your Personal Information was sold or disclosed for a business purpose (if applicable); and (6) the business or commercial purpose for collecting or, if applicable, selling your Personal Information. |
| <b>RIGHT TO DELETE</b>                     | You have the right to request that we delete your Personal Information that we have collected from you, with some exceptions. Note that if you request that we delete your information, we may be unable to provide you with certain offers or services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>RIGHT TO CORRECT</b>                    | You have the right to correct inaccurate Personal Information we maintain about you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>RIGHT TO OPT OUT OF SALE OR SHARING</b> | You have the right to say no to the sale of Personal Information or the sharing of your Personal Information for cross-context behavioral advertising purposes. We do not sell Personal                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|                                                                    |                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                    | Information, but we do engage in advertising practices that could be considered cross context behavioral advertising.                                                                                                                                                                                          |
| <b>RIGHT TO LIMIT PROCESSING OF SENSITIVE PERSONAL INFORMATION</b> | If we use or disclose Sensitive Personal Information for purposes other than those allowed by the CCPA and its regulations, the right to limit our use and disclosure. We do not collect, use or disclose Sensitive Personal Information for any purposes other than to provide our Sites and Services to you. |
| <b>RIGHT TO NON-DISCRIMINATION</b>                                 | You have the right to non-discrimination for exercising your CCPA rights. This means we cannot deny you goods or services, charge you different prices, or provide a different level of quality of goods or services just because you exercise your rights under the CCPA.                                     |

### How to Exercise Your Rights

If you have an account with us, you must log into your account and submit your request to know, delete, and/or correct through your account. If you do not have an account, You may submit a request to know, delete, and/or correct through [Privacy Request Form](#), by calling us toll free at 1-877-8201-1552. You may also contact us through any of the methods provided on our [TrainingPeaks Contact Us page](#), or you may email us at [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com) to request information or changes.

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods listed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

If you are a California resident, you have the right to direct us to stop selling or sharing your Personal Information.

You may submit a request to opt out of sales or sharing by going to <https://www.trainingpeaks.com> and clicking on “Manage Cookie Preferences”. If you have enabled privacy controls on your browser (such as a plugin), we will also treat that as a valid request to opt out. Please see the “**OPT-OUT PREFERENCE SIGNALS**” section above for more information.

### Our Process for Verifying a Request to Know, Delete, and/or Correct

We will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request. Our verification process may differ depending on whether you maintain a password-protected account with us.

If you maintain a password-protected account, we may verify your identity through existing authentication practices available through your account. Prior to disclosing or deleting the Personal Information, we will ask you to re-authenticate yourself with respect to that account.

If you do not maintain a password-protected account, or if you are an account-holder but we suspect fraudulent or malicious activity with your account, we will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure, deletion, or correction as applicable. To do so, we will ask you to verify data points based on information we have in our records concerning you.

### **Shine the Light Law**

If you are a California resident and have an established business relationship with us, California Civil Code § 1798.83 permits you to request information regarding the disclosure of your personal information by us to third parties for the third parties’ direct marketing purposes (as those terms are defined in that statute). To make such a request, please send an email to [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com) with the subject line “Shine the Light Request” or write us:

TrainingPeaks, LLC  
Attn: Privacy Team  
285 Century Place, Louisville, CO 80027  
United States of America

### **Erasure Law**

If you are a California resident under the age of 18 and a registered user of the Services, California Business & Professions Code § 22581 permits you to request and obtain removal of content or information posted on the Services by you. If you wish to make a request, please contact us at [privacy@trainingpeaks.com](mailto:privacy@trainingpeaks.com). Please be aware that removal does not ensure complete or comprehensive removal of the content or information posted on the Services by you and there may be legal reasons for denying your request.

## **15. NOTICE TO RESIDENTS OF THE EUROPEAN ECONOMIC AREA**

We recognize some of our website users, customers and prospective customers could be located within the EEA. If you are in a country in the European Economic Area (EEA) or in the United Kingdom, you are entitled to the following explanation of the legal bases we rely on to process your Personal Data and a description of your privacy rights. If you are not an EEA or United Kingdom resident, this section does not apply to you, and you should not rely on it.

The legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

- a. To fulfill a contract we have with you
- b. When we have a legal duty
- c. When it is in our legitimate interest
- d. When you provide consent
- e. Necessary for us to exercise or defend a legal claim

If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data for any specific processing activity, please contact us using the “**HOW TO CONTACT US**” section below.

## Your Rights

If you reside in the EEA, you have a number of rights under data protection laws in relation to the way we process your Personal Data, which are set forth below. You may contact us directly as described in the “**HOW TO CONTACT US**” section to exercise any of these rights, and we will verify your request and, if appropriate, respond to any request received from you within one month from the date of the request. In exceptional circumstances we may need to extend this timescale, but we will always tell you in advance if we do, and our reasons why.

|                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Right 1</b> | A right to access Personal Data held by us about you, as well as information about how we are using your data.                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Right 2</b> | A right to require us to rectify any inaccurate Personal Data held by us about you.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Right 3</b> | A right to require us to erase personal data held by us about you, and where the Personal Data has been made public, for other controllers processing the Personal Data to also erase links to, or copy or replication of, such Personal Data. This right will only apply where (for example): we no longer need to use the Personal Data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your Personal Data based on your consent; or where you object to the way we process your data (in line with Right 6 below). |
| <b>Right 4</b> | A right to restrict our processing of Personal Data held by us about you. This right will only apply where (for example): you dispute the accuracy of the Personal Data held by us; or where you would have the right to require us to erase the Personal Data but would prefer that our processing is restricted instead; or where we no longer need to use the Personal Data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.                                                                   |
| <b>Right 5</b> | A right to receive Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this Personal Data to another organization, at your request.                                                                                                                                                                                                                                                                                                                          |
| <b>Right 6</b> | A right to object to our processing of Personal Data held by us about you (including for the purposes of sending marketing materials to you).                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Right 7</b> | A right to withdraw your consent, where we are relying on it to use your Personal Data (for example, to provide you with marketing information about our services or products).                                                                                                                                                                                                                                                                                                                                                                                      |

If you have any concerns regarding our processing of your Personal Data, or are not satisfied with our handling of any request by you in relation to your rights, please get in touch with our team through the contact information provided in Section 2 of this Privacy Policy. You may also reach out to [your applicable Data Protection Authority](#) (“DPA”) for more information. There is a DPA located in each EU Member State.

## **16. ACCESSIBILITY**

If you wish to access this Privacy Policy in an alternate format, or would like to report an issue you are experiencing on our Sites or Services, please email us at [support@peaksware.com](mailto:support@peaksware.com).