

## **Privacy Policy**

**Effective date: August 6, 2022**

This Privacy Policy covers the information Nautilus Tracker, LLC (creator of online products, such as dream10x.com and vikingrows.com) collects about you when you use our products or services, or otherwise interact with us (for example, by attending our events), unless a different policy is displayed. This policy explains your choices about how we use information about you. Your choices include how you can object to certain uses of information about you and how you can access and update certain information about you. If you do not agree with this policy, do not access, or use our Services or interact with any other aspect of our business.

We offer digital content, products and services online. We create virtual experiences, structured workouts, and group events so that you can reach your training goals, team goals, and interact with others who use our platform. This means that Nautilus Tracker, LLC is a social platform, and that your profile information and information about your rows is shared with other users and, with your permission, shared with companies that allow users to connect with each other on other platforms.

If we modify this Privacy Policy, we will post the revised Privacy Policy online. We will notify you if the policy changes in any material way by sending a notice to the email address you provided us, if any, and by placing a prominent notice on our website. You should check regularly to see if this Privacy Policy has changed.

### **1. Information You Provide to Us**

We process your personal information because you've given us permission, and we need to process the information to provide the services you have requested and/or to fulfil our contract with you. We may also process your personal information to comply with the law e.g., our tax obligations.

#### **When you create an account**

To work out with 'Viking Rows' (<https://vikingrows.com>), for example, you'll need to create an account. To create an account, we ask you to provide your first name, last name, and email address, You will create a username. Your username and profile picture will be public (but only within the website, 'Viking Rows'), so use caution in deciding what to use. You can choose what information to share in your public profile, including personal identifiers: your first name, last name and email. You are then optionally able to provide additional information such as a profile picture.

When you use the Google Single Sign-On (SSO) button to create an account and login, we try to gather your first name, last name, email address and profile picture from your Google Account. Your first name, last name and email address are the minimum information we need to collect in order to create an account for you on the 'Viking Rows' website. If you share your Google Profile Image, we use that image as your profile image on 'Viking Rows' as well (at 'Viking Rows' you can change your profile image as desired).

Where you have provided us with consent to process your data, you can withdraw your consent at any time by managing your settings in the platform.

You may update, correct, or delete information about you at any time by logging into your account or emailing us at support@nautilustracker.com. Note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

### **When you manually record distances**

You are able to manually record the completed rowing distances. You are also able to add comments or photos to accompany the details of the exercise complete. We may also collect information that your browser sends whenever you visit our platform. This Log Data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our platform that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collect, monitor and analyze this type of information in order to increase our Service's functionality. These third-party service providers have their own privacy policies addressing how they use such information.

Whatever you do, we collect and store information about your activity on the website. We collect information about your workout, such as your time, meters, split or cadence, power, total calories burned. We also collect information about challenges and missions completed, your experience level, results and performance information, such as segment times, personal bests, rankings, including information on past performance. This information will NOT be available to anyone on the internet, but it may be made available to users of 'Viking Rows'.

## **2. Data Retention**

We store the information we collect about you (see above) for as long as is necessary for the purpose(s) for which we originally collected it. We may retain certain information for legitimate business purposes or as required by law.

We keep track of certain aggregate information about you and your use when you interact with or visit the platform. While this data may be derived from your personal data, it is not considered personal data in law because it does not directly or indirectly reveal your identity. This information includes the features you use, the links you click on, search terms and files you view.

When you contact us via social media or email us, we will collect your contact information and also collect the contents of your communication. We store this information for as long as is necessary for the purpose(s) for which we originally collected it.

## **3. How We Use the Information We Collect**

**To communicate with you about the platform.** We use your contact information to send transactional communications to you via email and within the platform. For example, we will send a purchase

confirmation, notify you of software updates, send you technical updates or contact you about your account.

**Promotional Communications.** You may opt out of receiving promotional emails from Nautilus Tracker, LLC by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as those about your account or updates to our platform. At your consent, we may send promotional and non-promotional push notifications or alerts to your email. You can deactivate these messages at any time by changing the notification settings by unsubscribing.

**For customer support purposes.** We use your information to resolve technical issues you encounter, to respond to your requests for assistance, and to repair and improve the Services.

**For safety and security.** We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

**For legitimate business interests and legal rights.** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, or when we need to comply with a legal or regulatory obligation, we may use information about you.

**In other circumstances with your consent.** We may use information about you when you have given us consent to do so for a specific purpose not listed in this privacy policy. Examples include published testimonies that you give us, or featured blog content for the purposes of promoting our Products and Services, with your permission.

## 1. Cookies

Cookies and other tracking technologies: Nautilus Tracker, LLC and our third-party partners, such as our payment and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognize you across different Services and devices. For more information, please see our Cookies Policy, which includes information on how to control or opt out of these cookies and tracking technologies.

## 2. Your Choices

This section describes choices available to Nautilus Tracker, LLC uses in all jurisdictions. If you are a resident of the EEA or California, you have additional rights as described in the separate sections applicable to you below.

**Account Information.** You may update, correct, or delete information about you at any time by logging into your account or emailing us at [support@nautilustracker.com](mailto:support@nautilustracker.com). If you wish to delete or deactivate your account, please visit <https://vikingrows.com> and follow the instructions. Note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

**Cookies.** Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject

cookies, this could affect the availability and functionality of our Services. For more information about cookies and how to disable them, please visit our Cookie Policy.

**Promotional Communications.** You may opt out of receiving promotional emails by following the instructions in those emails. If you opt out, we may still send you non-promotional emails, such as those about your account or updates to our Services.

**Mobile Push Notifications/Alerts.** With your consent, we may send promotional and non-promotional push notifications or alerts to your desktop or mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

**Right to Withdraw Consent.** Where you have provided us with consent to process your data, you can withdraw your consent at any time by managing your settings in the companion App or contacting us at [support@nautilustracker.com](mailto:support@nautilustracker.com)

### 3. Your EEA Rights

Individuals residing in the EU have the following rights:

You have the right to ask us to access the PII we hold about you and be provided with certain information about how we use your PII and who we share it with. You also have the right to ask us to correct your PII where it is inaccurate or incomplete.

In certain circumstances, you have the right to ask us to delete the PII we hold about you:

- o where you believe that it is no longer necessary for us to hold your PII;
- o where we are processing your PII on the basis of legitimate interests and you object to such processing and we cannot demonstrate an overriding legitimate ground for the processing;
- o where you have provided your PII to us with your consent and you wish to withdraw your consent and there is no other ground under which we can process your PII; or
- o where you believe the PII we hold about you is being unlawfully processed by us.

In certain circumstances, you have the right to ask us to restrict (stop any active) processing of your PII:

- o where you believe the PII we hold about you is inaccurate and while we verify accuracy;
- o where we want to erase your PII as the processing is unlawful but you want us to continue to store it;
- o where we no longer need your personal data for the purposes of our processing but you require us to retain the data for the establishment, exercise or defense of legal claims; or where you have objected to us processing your personal data based on our legitimate interests and we are considering your objection.

In addition, you can object to our processing of your personal data based on our legitimate interests and we will no longer process your personal data unless we can demonstrate an overriding legitimate ground.

If you would like to exercise any of these rights, you can log into your account and edit your profile. Alternatively, you may contact us as indicated below. We will respond to your request within a reasonable time frame.

Please note that these rights are limited, for example, where fulfilling your request would adversely affect other individuals or Nautilus Tracker, LLC trade secrets or intellectual property, where there are overriding public interest reasons or where we are required by law to retain your personal data.

#### **4. Cross-Border Information Transfers**

You acknowledge (a) that you are accessing a Site that is based in the United States, (b) that you are providing personal information to a company in the United States, and (c) that Nautilus Tracker, LLC must adhere to laws of the United States. You agree that personal information collected on our Site may be stored and processed in the United States or any other country in which Nautilus Tracker, LLC, its affiliates, partners, service providers, or agents maintain facilities, and while in such jurisdictions may be subject to access pursuant to the laws of those jurisdictions.

Each of these countries has different privacy laws that afford varying levels of protection for your personal information, and such laws may be less stringent or may not be as comprehensive as those laws that exist in your country.

#### **5. Contact and Dispute Resolution**

In compliance with the Privacy Shield Principles, Nautilus Tracker, LLC commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Nautilus Tracker, LLC at email address: [support@nautilustracker.com](mailto:support@nautilustracker.com). Nautilus Tracker, LLC has further committed to refer unresolved Privacy Shield complaints to the International Centre for Dispute Resolution (ICDR), the international division of the American Arbitration Association, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <http://go.adr.org/privacysshield.html> for more information or to file a complaint. The services of the ICDR are provided at no cost to you.

#### **6. Binding Arbitration**

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with Nautilus Tracker, LLC and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see US Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration).

## 7. Contact Us

Your information is controlled by Nautilus Tracker, LLC. If you have any questions or concerns about this Privacy Policy or your information, please direct your inquiry to Nautilus Tracker, LLC or if you are a resident of the European Economic Area, please contact our EU representative.

**Email (for Privacy Concerns or General Contact):** [support@nautilustracker.com](mailto:support@nautilustracker.com)

California Residents, please include “CCPA Privacy Request” in the subject line.

**Website:** [www.vikingrows.com](http://www.vikingrows.com)