

Understanding and Accessing Your Personal Information

At Fitbit, we have a long-standing commitment to privacy and data protection. We take our obligation to safeguard users' personal information very seriously and are committed to protecting the privacy and security of our users, while being transparent about our data practices.

To that end, we empower our users to access, download, and delete their personal data through our self-help tools. You may use our data export tool to download a copy of your data. For more information, see https://help.fitbit.com/articles/en_US/Help_article/1133. You may also delete your Fitbit account by following the instructions provided in the Help Center at https://help.fitbit.com/articles/en_US/Help_article/1285.

Below please find information about how we may collect, use, and disclose your personal information. To learn more, please visit our privacy policy at <https://www.fitbit.com/legal/privacy-policy>.

We process the following categories of personal information:

Information You Provide Us

Account Information

Some information is required to create an account on our Services, such as your name, email address, password, date of birth, gender, height, weight, and in some cases your mobile telephone number. This is the only information you have to provide to create an account with us. You may also choose to provide other types of information, such as a profile photo, biography, country information, and community username.

Additional Information

To help improve your experience or enable certain features of the Services, you may choose to provide us with additional information, like your logs for food, weight, sleep, water, or female health tracking; an alarm; and messages on discussion boards or to your friends on the Services.

You may also connect with friends on the Services or invite friends who have not yet joined by providing their email addresses, accessing social networking accounts, or using the contact list on your mobile device. We do not store your contact list and delete it after it is used for adding contacts as friends.

If you contact us or participate in a survey, contest, or promotion, we collect the information you submit such as your name, contact information, and message.

Payment and Card Information

Some Fitbit devices support payments and transactions with third parties. If you activate this feature, you must provide certain information for identification and verification, such as your name, credit, debit or other card number, card expiration date, and CVV code. This information is encrypted and sent to your card network, which upon approval sends back to your device a token, which is a set of random digits for engaging in transactions without exposing your card

number. For your convenience, we store the last four digits of your card number and your card issuer's name and contact information. You can remove the token from your account using your account settings. We do not store your transaction history.

If you purchase Fitbit merchandise on our website, you provide your payment information, including your name, credit or debit card number, card expiration date, CVV code, and billing address. We do not store this payment information. We store your shipping address to fulfill your order. Note that third-party payment processors may retain this information in accordance with their own privacy policies and terms.

Live Coaching Services

Our live coaching services are a platform for you to communicate with a live health, fitness, or wellness coach ("Live Coaching Services"). Coaches may be provided by third parties, such as your employer or insurance company, or by our third-party coaching service providers. If you use our Live Coaching Services, we collect information about such use, including the plan, goals, and actions you record with your coach, your calendar events, communications with your coach, notes your coach records about you, and other information submitted by you or your coach.

Information We Receive From Your Use of Our Services

Device Information

Your device collects data to estimate a variety of metrics like the number of steps you take, your distance traveled, calories burned, weight, heart rate, sleep stages, active minutes, and location. The data collected varies depending on which device you use. When your device syncs with our applications or software, data recorded on your device is transferred from your device to our servers.

Geolocation Information

The Services include features that use precise geolocation data, including GPS signals, device sensors, Wi-Fi access points, and cell tower IDs. We collect this type of data if you grant us access to your location. You can always remove our access using your Fitbit device or mobile device settings. We may also derive your approximate location from your IP address.

Usage Information

When you access or use our Services, we receive certain usage or network activity information. This includes information about your interaction with the Services, for example, when you view or search content, install applications or software, create or log into your account, pair your device to your account, or open or interact with an application on your Fitbit device.

We also collect data about the devices and computers you use to access the Services, including IP addresses, browser type, language, operating system, Fitbit or mobile device information (including device and application identifiers), the referring web page, pages visited, location (depending on the permissions you have granted us), and cookie information.

Information We Receive From Third Parties

If you choose to connect your account on our Services to your account on another service, we may receive information from the other service. For example, if you connect to Facebook or Google, we may receive information like your name, profile picture, age range, language, email address, and friend list. You may also choose to grant us access to your exercise or activity data from another service. You can stop sharing the information from the other service with us by removing our access to that other service.

We may partner with third parties, such as employers and insurance companies that offer Fitbit Services to their employees and customers. In such cases, those companies may provide us with your name, email address, or similar information (like a telephone number or subscriber ID) so that we can invite you to participate or determine your eligibility for particular benefits, such as discounts or free services.

We use the information we collect for the following purposes:

Provide and Maintain the Services

Using the information we collect, we are able to deliver the Services to you and honor our Terms of Service contract with you. For example, we need to use your information to provide you with your Fitbit dashboard tracking your exercise, activity, and other trends; to enable the community features of the Services; and to give you customer support.

For the Services' community features, we may use your information to help you find and connect with other users and to allow other users to find and connect with you. For example, your account contact information allows other users to add you as a friend. When another user has your email or mobile phone number in their contact list or in their friend network on a connected service, we show that user that you are a user of the Services.

If you use the Live Coaching Services, we use your information to connect you with coaches, allow you to communicate with them through our Services, and help you achieve your goals to lead a healthier, more active life. For example, the goals that you provide allow you to develop a personal plan and set of actions in consultation with your coach.

Improve, Personalize, and Develop the Services

We use the information we collect to improve and personalize the Services and to develop new ones. For example, we use the information to troubleshoot and protect against errors; perform data analysis and testing; conduct research and surveys; and develop new features and Services.

When you allow us to collect precise location information, we use that information to provide and improve features of the Services such as recording where a workout took place or mapping an activity.

We also use your information to make inferences and show you more relevant content. Here are some examples:

- Information like your height, weight, gender, and age allows us to improve the accuracy of your daily exercise and activity statistics like the number of calories you burned and the distance you travelled.

- Based on your sleep data, we may make inferences about your sleeping patterns and provide you with customized insights to help you improve your sleep.
- We may personalize exercise and activity goals for you based on the goals you previously set and your historical exercise or activity data.

Communicate with You

We use your information when needed to send you Service notifications and respond to you when you contact us. We also use your information to promote new features or products that we think you would be interested in. You can control marketing communications and most Service notifications by using your notification preferences in account settings or via the “Unsubscribe” link in an email.

Promote Safety and Security

We use the information we collect to promote the safety and security of the Services, our users, and other parties. For example, we may use the information to authenticate users, facilitate secure payments, protect against fraud and abuse, respond to a legal request or claim, conduct audits, and enforce our terms and policies.

We never sell the personal information of our users. We do not share your personal information except in the limited circumstances described below:

When You Agree or Direct Us To Share

You may direct us to disclose your information to others, such as when you use our community features like the forums, 7-day leaderboard, and other social tools. For certain information, we provide you with privacy preferences in account settings and other tools to control how your information is visible to other users of the Services. Just remember that if you choose to participate in a challenge, information like your profile photo, posted messages, total steps in the challenge, personal statistics, and achievements, is not governed by your privacy preferences and will be visible to all other challenge participants.

You may also direct us to share your information in other ways, for example, when you give a third-party application access to your account, or give your employer access to information when you choose to participate in an employee wellness program. Remember that their use of your information will be governed by their privacy policies and terms. You can revoke your consent to share with third-party applications or employee wellness programs using your account settings.

For External Processing

We transfer information to our corporate affiliates, service providers, and other partners who process it for us, based on our instructions, and in compliance with this policy and any other appropriate confidentiality and security measures. These partners provide us with services globally, including for customer support, information technology, payments, sales, marketing, data analysis, research, and surveys.

For Legal Reasons or To Prevent Harm

We may preserve or disclose information about you to comply with a law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, fraud, abuse, violations of our terms, or threats to the security of the Services or the physical safety of any person.

Please note: Our policy is to notify you of legal process seeking access to your information, such as search warrants, court orders, or subpoenas, unless we are prohibited by law from doing so. In cases where a court order specifies a non-disclosure period, we provide delayed notice after the expiration of the non-disclosure period. Exceptions to our notice policy include exigent or counterproductive circumstances, for example, when there is an emergency involving a danger of death or serious physical injury to a person.

We may share non-personal information that is aggregated or de-identified so that it cannot reasonably be used to identify an individual. We may disclose such information publicly and to third parties, for example, in public reports about exercise and activity, to partners under agreement with us, or as part of the community benchmarking information we provide to users of our subscription services.

If we are involved in a merger, acquisition, or sale of assets, we will continue to take measures to protect the confidentiality of personal information and give affected users notice before transferring any personal information to a new entity.

Data Retention:

We keep your account information, like your name, email address, and password, for as long as your account is in existence because we need it to operate your account. In some cases, when you give us information for a feature of the Services, we delete the data after it is no longer needed for the feature. For instance, when you provide your contact list for finding friends on the Services, we delete the list after it is used for adding contacts as friends. We keep other information, like your exercise or activity data, until you use your account settings or tools to delete the data or your account because we use this data to provide you with your personal statistics and other aspects of the Services. We also keep information about you and your use of the Services for as long as necessary for our legitimate business interests, for legal reasons, and to prevent harm.

Privacy Disclosures for Users Living in Certain Jurisdictions:

If you are a California resident, please review the following additional privacy disclosures under the California Consumer Privacy Act at

<https://www.fitbit.com/us/legal/privacy-policy#california-privacy-disclosures>.

If you live in the European Economic Area, United Kingdom, or Switzerland, please review these additional privacy disclosures under the European Union's General Data Protection Regulation ("GDPR") at

<https://www.fitbit.com/us/legal/privacy-policy#european-privacy-disclosures>. Please also note that we do not engage in the "automated decision making" referred to in Article 22 of the GDPR.