

# Privacy Policy

*Last updated: May 25, 2018*

At SANDOW, the privacy of your personal information is important to us. We are committed to providing you with an experience on all of our sites and services that is safe, secure and trustworthy.

We work hard to be transparent about what Personal Information we collect and process, while striving to use clear and direct language to describe our privacy practices to help you make informed decisions.

## Introduction

In order to personalize and improve your experience, SANDOW collects, processes and stores your Personal Information as you use our websites, mobile apps, social media pages and services and those of our brands that link to this policy (collectively, the “SANDOW Properties”). “Personal Information” is information that can identify you, such as your name, email or street address, or it may be information that could reasonably be linked back to you.

This Privacy Statement describes our practices for collecting, storing and processing your Personal Information and the controls we provide you to manage it within our Services.

By visiting and/or using any of the SANDOW Properties, you consent to the practices described in this Privacy Statement . If you have questions or concerns regarding this statement, you should contact SANDOW by e-mail at [privacy@sandow.com](mailto:privacy@sandow.com) (<mailto:privacy@sandow.com>).

## 1. What information does SANDOW collect from you?

The below describes the information we collect from you for our SANDOW Properties. In this Privacy Statement, we refer to this as your “Personal Information”.

Information Category	Use Description
<i>Account Information</i>	<ul style="list-style-type: none"><li>-Your name, title, business/company</li><li>-Email address and/or mailing address</li><li>-Password that you provide when you create an account</li><li>-Mobile or other phone number that you provide</li><li>-Demographic information</li><li>-Shipping or transactional information</li></ul>
<i>Credit Card/Payment Information</i>	<ul style="list-style-type: none"><li>-Payment information such as your credit card number and your billing and shipping addresses when you purchase something from SANDOW Properties</li></ul>
<i>Profile Information</i>	<ul style="list-style-type: none"><li>-We collect the information you provide when you voluntarily create a user profile</li><li>-Additional personal details that you provide in your profile (for example, image, name, age, location)</li></ul>

<b>Information Category</b>	<b>Use Description</b>
<i>User Provided Content</i>	-Information you provide about yourself when you voluntarily contribute to SANDOW Properties, or participate in community discussions.
<i>Social Media Information</i>	-If you use Facebook to log into the SANDOW Properties, we collect information from your Facebook profile that you choose to provide to us (for example, your Facebook profile information)
<i>Additional User Information</i>	-Information that you provide to us when you answer email surveys or online questionnaires offered through SANDOW Properties (for example, user names, e-mail addresses and mailing addresses for select mailings from third parties, as well as opinions and preferences)
<i>Contests and Promotions</i>	-Personal Information when you voluntarily participate in contests and special promotions we run through any of our SANDOW Properties

## **2. What information does SANDOW collect through your use of the Services?**

<b>Information Category</b>	<b>Use Description</b>
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Information Category	Use Description
<i>Computer and Mobile Device Information</i>	<p>-Information about how you access any of our SANDOW Properties, including the website you visited before and after a SANDOW site</p> <p>-The Internet Protocol ("IP") address of your computer, mobile device, or proxy server you use to access the Internet, in addition to other information such as:</p> <ul style="list-style-type: none"><li>&gt;Computer operating system</li><li>&gt;Web browser</li><li>&gt;Mobile device identifier provided by your mobile device operating system and your mobile operating system</li><li>&gt;Name of your internet service provider or mobile carrier</li></ul>
<i>Information from Cookies and similar technologies</i>	<p>-Cookies and similar technologies as described in our Cookie Policy. Please refer to our Cookie Policy to learn about our practices and the controls we provide you</p>

Information Category	Use Description
<i>Information shared through social media features</i>	<p>-If you interact with social media through SANDOW Properties such as our Facebook, Twitter, Pinterest, Instagram and LinkedIn pages, SANDOW will collect these interactions and whatever account information these sites make available to us</p> <p>-Your interaction with these features are governed by the privacy statement of the applicable third-party company</p>
<i>Information from your use of the Services</i>	<p>-Information about your use of any of our SANDOW Properties such as when you search, which pages you view or links you click on, or when you save/share content, etc.</p>

### 3. Information we collect from other sources

Information Category	Use Description
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Information Category	Use Description
<i>Information from third parties</i>	<div>-We may also receive information about you from third parties, such as supplemental data we collect with demographic information which are licensed from third parties to personalize any of our SANDOW Properties and our offers to you</div> <div>-If you purchase a gift subscription, we will collect Personal Information to complete the gift and notify the recipient</div>

4. How do we use your Personal Information?

Information Category	Use Description
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Information Category	Use Description
<i>Personal Information (generally)</i>	<p>-We use your Personal Information to provide, personalize, improve and expand any of our SANDOW Properties. This includes:</p> <ul style="list-style-type: none"> <li>&gt;Authenticate your access to SANDOW Properties</li> <li>&gt;Processing your payments for subscriptions, services and other products and features</li> <li>&gt;Building new and improving existing products and services</li> <li>&gt;Issuing surveys and questionnaires to collect Additional User Information for use in the Services, as well as facilitating product development and research initiatives, and publishing or otherwise disclosing aggregated or otherwise anonymized data</li> <li>&gt;Conducting scientific and statistical research</li> <li>&gt;Detecting and protecting against error, fraud or other criminal activity and enforcing our Terms and Conditions</li> </ul>

**Information Category****Use Description***Communications*

-We use our Personal Information to communicate with you about any of our SANDOW Properties such as when we:

- >Respond to inquiries to any of our SANDOW Properties
- >Inform you of product changes or new products and services
- >Ask you to participate in SANDOW Properties media productions or testimonials
- >Provide you with information or request action in response to technical, security, and other operational issues

*Market new products and offers from us or our business partners*

-We may use your Personal Information to market new products and offers from us or our partners. This includes advertising personalized to you based on your interests either on SANDOW Properties sites or through remarketing services so that third-party websites can serve interest-based ads targeting a user after they leave a SANDOW website.

**5. When do we share your information and who receives it?**



Circumstances when sharing may occur	Description
<i>Service Providers</i>	<p>-We use other companies to help us provide some products/services to you for any of our SANDOW Properties. As a result, these partners will have some of your information in their systems. Our partners are subject to contractual obligations governing data security and confidentiality as well as applicable laws. However, we will only share such personally identifiable information as we deem necessary for our service providers to carry out their obligations to or on behalf of SANDOW Properties</p> <p>-These service providers may include:</p> <ul style="list-style-type: none"><li>&gt;Independent contractors</li><li>&gt;Payment processors</li><li>&gt;Cloud services infrastructure providers</li><li>&gt;Vendors for marketing, advertising, data, distribution analytics, scheduling and fraud prevention</li></ul>

**Circumstances when sharing may occur****Description***Legal or regulatory process*

-We may share your Personal Information if we believe it is necessary to:

- >Comply with valid legal process
- >Enforce or apply SANDOW Terms and Conditions
- >Protect the security or integrity of our SANDOW Properties
- >Protect the rights, property or safety of SANDOW, our employees or users.

**Note:** If we are compelled to disclose your Personal Information to law enforcement, we will do our best to provide you with advance notice, unless we are prohibited under law from doing so.

*If SANDOW is acquired*

-If SANDOW or any of its businesses or business lines are acquired or transferred, we will share your Personal Information with the acquiring or receiving entity. The promises of this Privacy Statement will continue to apply to your Personal Information that is transferred to the new entity.

**Circumstances when sharing  
may occur**

**Description**

*Aggregated data*

-SANDOW Properties may disclose user information in an aggregated form as part of the Services or our marketing. We will also share demographic information with independent contractors, service providers, consultants, advertisers and other partners for purposes of research, business initiatives, collaborations, and more. Such disclosures will never include Personal Information.

**6. Your choices and access to your personal information.**

Rights that you may have by law, depending on the country in which you live, include (subject to certain exceptions): a right to request access to your Personal Information and to be provided with a copy of certain information you provided in a portable form, as well as to seek to update or correct this information, or to have us delete this information. Details and options for accessing this information are listed below.

We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. To submit any requests, or if you have questions or concerns, you should contact SANDOW Properties at [privacy@sandow.com](mailto:privacy@sandow.com) (mailto:privacy@sandow.com).

## 7. What are SANDOW's retention practices?

Category of Information	Retention Period
<i>Account Information</i>	-SANDOW Properties will retain the Personal Information you provide while creating your account until such time as you ask us to close it.
<i>Credit Card/Payment Information</i>	SANDOW Properties may retain Personal Information in connection with previous transactions or activity on the SANDOW Properties
<i>Usage Information</i>	-In some cases we choose to retain usage information (for example, visits to sites) in a depersonalized or aggregated form. Once aggregated, this information ceases to be personal and will not be subject to user deletion requests.

## 8. How can I delete my Personal Information?

Information Category	How to Delete
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<b>Information Category</b>	<b>How to Delete</b>
<i>Personal Information</i>	<p>If you require assistance deleting Personal Information you provided as part of your profile or subscription, please submit a deletion request (including the exact wording of the information as it appears on the websites, and the URL where the information is found) to our Privacy Policy Team by emailing <a href="mailto:privacy@sandow.com">privacy@sandow.com</a> (<a href="mailto:privacy@sandow.com">mailto:privacy@sandow.com</a>).</p> <p>SANDOW Properties may also retain certain information as reasonably necessary to comply with our legal obligations (including law enforcement requests), resolve disputes, maintain security, prevent fraud and abuse, as well as to comply with tax, payment industry, securities, and clinical regulatory compliance requirements.</p>
<i>Credit Card/Payment Information</i>	<p>SANDOW Properties may retain Personal Information in connection with previous transactions or activity on the SANDOW Properties</p>

**Information Category****How to Delete***Usage Information*

-In some cases we choose to retain usage information (for example, visits to sites) in a depersonalized or aggregated form. Once aggregated, this information ceases to be personal and will not be subject to user deletion requests.

**9. Security**

SANDOW Properties have implemented technical, administrative and physical security measures that are designed to protect User information from unauthorized access, disclosure, use and modification. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable.

SANDOW Properties regularly review our security and privacy practices and enhance them as necessary to help ensure the integrity of our systems and your Personal Information. We only partner with security companies that meet and commit to our security standards. While we cannot guarantee that loss, misuse or alteration of data will not occur, we use reasonable efforts to prevent this.

It is also important for you to guard against unauthorized access to your Personal Information by maintaining strong passwords and protecting against the unauthorized use of your own computer or device.

**10. Data Transfer**

SANDOW operates globally so it may be necessary from time to time to transfer your information internationally. In particular, a User's

information will likely be transferred to and processed in the United States where many of our central databases operate. The data protection and related laws of other countries, such as the United States, may not be as comprehensive as those in your country. Please be assured that we take reasonable steps to ensure that your privacy is protected. By using the SANDOW Properties, you consent to your information being collected, used and transferred as set forth in this Privacy Statement.

Lastly, to the extent SANDOW is permitted to do so in accordance with applicable laws and regulations, we reserve the right to rent, sell or otherwise commercialize our Users' data and registration information.

## **11. Changes to this Privacy Statement**

SANDOW reserves the right to make changes to the Privacy Statement at any time. If we plan to make material changes to any of our privacy policies or practices with respect to how we use Personal Information, we will provide prominent advance notice of any material changes to this Statement, such as posting a notice through any of our SANDOW Properties, or sending you an email, before they take effect so our Users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. Please review our Privacy Statement periodically to see recent changes.

Your continued use of any of our SANDOW Properties after notice of changes means that you consent to the updated Privacy Statement.

## **12. Notice to California Residents**

If you are a California resident, California Civil Code Section 1798.83, known as the "Shine the Light" law, permits users who are California residents to request information regarding the disclosure of your personal information by SANDOW Properties to third parties for the

third parties' direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. To make such a request, please send an email to [privacy@sandow.com](mailto:privacy@sandow.com) (<mailto:privacy@sandow.com>). In your request, please specify the particular product, service and site within the SANDOW Properties to which your request or inquiry pertains

### **13. Privacy and Security Concerns**

If you have any questions about this Privacy Statement, the practices or your dealings with any SANDOW Properties, or if you wish to receive a printed version of this Privacy Statement, please contact us:

SANDOW

101 Park Avenue, 4th Floor

New York, NY 10178

Attn: Privacy Policy Team

Email: [privacy@sandow.com](mailto:privacy@sandow.com) ([mailto: privacy@sandow.com](mailto:privacy@sandow.com))

### **14. Linking**

SANDOW may offer links to other Web sites. Please be aware that SANDOW is not responsible for the privacy practices of such linked sites, including sites of our partners. We encourage our Users to be aware of this when they leave any of the SANDOW Properties and to read the privacy statements of each and every Web site that collects personally identifiable information.

### **15. Children**

None of the SANDOW Properties are directed at children, and SANDOW does not sell products or services for purchase by children.



We may, however, sell children's products for purchase by adults. If you are under the age of 18, you may use the SANDOW Properties only with the involvement and authorization of a parent or guardian. Parents, please monitor your children's use of the Internet.

## **16. Choice/Opt Out**

SANDOW gives Users the ability to opt-out of receiving future communications. To opt-out of email communications, follow the "unsubscribe" links included at the bottom of email communications or send an email to [optout@sandow.com](mailto:optout@sandow.com) (<mailto:optout@sandow.com>).

## **17. Use of "Do Not Track Signals"**

In order to provide you with an optimal, personalized experience, SANDOW does not respond to pre-set web browser requests signaling a User's request not to be tracked on the Web Site. Users may follow the opt-out instructions provided herein if they wish not to be tracked, however, SANDOW may not be able to provide the same services and offerings within the SANDOW Properties without tracking.

## **18. Legal basis under EU General Data Protection Regulation for processing personal information of EU residents.**

This section shall apply to any personal data collected by SANDOW Properties from EU residents to whom the GDPR applies.

Where you have consented to data processing, your consent provides the legal basis to process your Personal Information. You have the right to withdraw consent at any time. Please note that your withdrawal of consent to collect and process your Personal Information will not affect the lawfulness of processing your Personal Information based on your consent before you withdrew your consent.

We may also process your Personal Information on the basis of contractual necessity to perform a contract we have with you. For example, we process your credit card details when you provide them in order to use our Services or to buy our Services as a gift for a third party.

We may also process your Personal Information on the basis of our legitimate interests, including in providing and improving the Services. For example, SANDOW Properties have a legitimate interest in understanding your login history so we can assess your interaction with our Services. We also have a legitimate interest in providing and developing interesting features to provide to our users. We use your Personal Information to keep our Services safe and secure and we do so as it necessary to pursue your and our legitimate interests in ensuring that our Services are secure, and to protect against fraud, spam and abuse.




Where we rely on legitimate interests to process your Personal Information, you have the right to object to such processing (meaning that you can ask us to stop). You can use the links referenced above regarding your account at SANDOW Properties, or follow our Cookie Policy, to control certain ways in which we process your data. You can also contact us to object to other forms of processing.



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