

## OHUP Privacy Policy

Updated on 2024.1.14

Effective Date: 2024.1.15

This policy will help you understand the following:

1. **How we collect and use your user information**
2. **How we use cookies and similar technologies**
3. **How We Share, Transfer, and Publicly Disclose Your User Information**
4. **How do we protect your user information?**
5. **Your rights**
6. **How We Process Children's Personal Information**
7. **How your user information is stored and how it is transferred globally**
8. **How this Policy is Updated**
9. **How to contact us**

We understand the importance of user information to you and will do our best to protect your user information safely and securely. We are committed to maintaining your trust in us and abiding by the following principles to protect your user information: the principle of consistency of rights and responsibilities, the principle of clear purpose, the principle of opt-in and consent, the principle of minimum sufficiency, the principle of ensuring security, the principle of subject participation, the principle of openness and transparency, etc. At the same time, we promise that we will take corresponding security protection measures to protect your user information by mature security standards in the industry.

Please read and understand this Privacy Policy carefully before using our products (or services).

### **1. How we collect and use your user information**

(1) Information collected and used by us during your use of our products or services

We will only collect and use your user information for the business functions described in this policy, and the purpose of collecting user information is to provide you with products or services, you have the right to choose whether to provide the information, but in most cases, if you do not provide it, we may not be able to provide you with the corresponding services and respond to the problems you encounter:

When you use our services, we are allowed to collect the information that you provide to us or that is necessary to provide you with services, including personal identification information, device information, log information, IP address, location information, etc.

The user information we collect will be used to provide you with functions such as identity verification, customer service, security, display of activity

physical training records, etc.

The above information you provide will continue to be authorized for us to use during your use of this service. When you stop using the push service, we will stop using it and delete the above information.

We guarantee that the collected user information will be de-identified or anonymized by the law, and information that cannot identify a natural person alone or in combination with other information is not personal in the legal sense. If we combine non-personal information with other information to identify you personally, or when combined with your personal information, we will treat and protect such information as your personal information during the combined use by this Privacy Policy.

To better operate and improve our technology and services, or due to changes in business strategies, when the collection, use, and processing of user information required for the products or services we provide exceed the above scope, or when we want to use the collected user information for other purposes not specified in this Privacy Policy, or when we want to use the information collected for a specific purpose for other purposes, we will notify you within a reasonable period after obtaining the user information or before processing the user information, and obtain your authorization and consent.

## (2) Exceptions to obtaining authorization and consent

Please understand that, by laws and regulations and relevant national standards, we do not need to obtain your authorization and consent to collect and use your user information under the following circumstances:

- 1) Directly related to national security and national defense security;
- 2). Directly related to public safety, public health, or major public interests;
- 3). Directly related to a criminal investigation, prosecution, trial, and judgment enforcement;
- 4). to protect the life, property, and other major legitimate rights and interests of you or other individuals, but it is difficult to obtain the consent of the person;
- 5). The user information collected by you is disclosed to the public by yourself;
- 6). Your user information is collected from legally and publicly disclosed information, such as legitimate news reports, government information disclosure, and other channels;
- 7). It is necessary to sign or perform the contract according to your requirements;
- 8). Necessary to maintain the safe and stable operation of software and related services, such as discovering and disposing of faults of software and related services;
- 9). Where the Personal Data Controller is a new unit and they must carry out lawful news reporting;
- 10). When academic research institutions must carry out statistical or academic research based on the public interest, and when the results of academic research or descriptions are provided to the outside world, the personal information

contained in the results is de-identified.

11). Other circumstances stipulated by laws and regulations.

## **2. How we use cookies and similar technologies**

### (1) Cookies

To ensure the proper functioning of our products and services, we store small data files called cookies on your computer or mobile device. Cookies typically contain identifiers, site names, and some numbers and characters. With the help of cookies, the website can store data about your preferences.

We will not use cookies for any purpose other than those described in this policy. You can manage or delete cookies according to your preferences. You can erase all cookies saved on your computer, and most web browsers have a function to block cookies. However, if you do so, you may need to change your user settings each time you access and use our products or services.

### (2) Web beacons and pixel tags

In addition to cookies, we also use other similar technologies, such as web beacons and pixel tags, on our website. For example, the e-mails we send you may contain click-through URLs that link to content on our website.

If you click on the link, we will track that visit to help us understand your product or service preferences and improve customer service. A web beacon is usually a transparent image embedded in a website or email. With the help of pixel tags in emails, we know if an email has been opened. If you do not want your activity to be tracked in this way, you can unsubscribe from our mailing list at any time.

### (3) Do Not Track

Many web browsers have a Do Not Track feature that publishes Do Not Track requests to websites. At this time, the major Internet standards organizations do not have policies in place that govern how websites should respond to such requests. However, if Do Not Track is enabled in your browser, then all of our websites will respect your choice.

## **3. How We Share, Transfer, and Publicly Disclose Your User Information**

### (1) Sharing

We will not share your user information with any other company, organization, or individual, except in the following circumstances:

- 1). Sharing with explicit consent: After obtaining your explicit consent, we will share your user information with other parties.
- 2). We may share your user information externally by laws and regulations, or by the mandatory requirements of government authorities.
- 3). Sharing with our affiliates: Your user information may be shared with our affiliates. We will only share necessary user information and are bound by the purposes stated in this Privacy Policy. If the affiliate company wants to change

the purpose of processing user information, it will ask for your authorization and consent again.

4). Sharing with authorized partners: For the purpose stated in this Policy, some of our services will be provided by authorized partners. We may share some of your user information with our partners to provide better customer service and user experience. We will only share your user information for legitimate, legitimate, necessary, specific, and explicit purposes, and will only share the user information necessary to provide services. To better operate and improve the technology and services, you agree that we and our authorized partners may use the collected information for other services and purposes under the premise of complying with relevant laws and regulations.

The following lists specific authorized partners and provides links to the privacy policies of such third parties, which we encourage you to read:

(2) Advertising and media: We may share the collected information with advertising, media, and other authorized partners for commercial purposes, including optimizing advertising and improving marketing effectiveness.

We will sign strict confidentiality agreements with companies, organizations, and individuals with whom we share user information, requiring them to handle user information according to our instructions, this Privacy Policy, and any other relevant confidentiality and security measures.

### (3) Transfer

We will not transfer your user information to any company, organization, or individual, except in the following circumstances:

1). Transfer with explicit consent: After obtaining your explicit consent, we will transfer your user information to other parties;

2). In the event of merger, acquisition, or bankruptcy liquidation, if the transfer of user information is involved, we will require the new company or organization that holds your user information to continue to be bound by this Privacy Policy, otherwise we will require the company or organization to seek your authorization and consent again.

### (4) Public Disclosure

We will only publicly disclose your user information in the following circumstances:

1). After obtaining your explicit consent;

2). Disclosure based on law: We may publicly disclose your user information under the mandatory requirements of laws, legal procedures, litigation, or government authorities.

### (5) Exceptions to obtaining prior authorization and consent when sharing, transferring, or publicly disclosing information

Please understand that, by laws and regulations and relevant national standards, we do not need to obtain your authorization and consent to share, transfer, and

publicly disclose your user information under the following circumstances:

- 1). Directly related to national security and national defense security;
- 2). Directly related to public safety, public health, or major public interests;
- 3). Directly related to a criminal investigation, prosecution, trial, and judgment enforcement;
- 4). to protect the life, property, and other major legitimate rights and interests of you or other individuals, but it is difficult to obtain the consent of the person;
- 5). Information you disclose to the public;
- 6). Collected legally and publicly disclosed information, such as lawful news reports, open government information, and other channels.

#### **4. How do we protect your user information?**

(1) We have used security measures that comply with industry standards to protect the user information you provide and prevent unauthorized access, public disclosure, use, modification, damage, or loss of the data. We will take all reasonable and practicable measures to protect your user information. For example, the exchange of data between your browser and the Service is protected by SSL encryption; We also provide https secure browsing methods for our website; We use encryption technology to ensure the confidentiality of data; We use trusted protection mechanisms to protect your data from malicious attacks; We will deploy access control mechanisms to ensure that only authorized personnel have access to user information; and we will conduct security and privacy training courses to raise awareness among employees of the importance of protecting user information.

(2) We will take all reasonable and feasible measures to ensure that no irrelevant user information is collected. We will only retain your user information for as long as necessary to achieve the purposes described in this policy unless it is necessary to extend the retention period or permitted by law.

(3) The Internet is not a secure environment, and e-mail, instant messaging, and communication with other users are not encrypted, we strongly recommend that you do not send user information through such means.

(4) The Internet environment is not 100% secure, and we will do our best to ensure the security of any information you send to us. Even if we have made great efforts and taken all reasonable and necessary measures, it is still possible that we will not be able to prevent your user information from being illegally accessed, illegally stolen, illegally tampered with, or destroyed, resulting in the damage to your legitimate rights and interests.

(5) In the unfortunate event of a user information security incident, we will, by the requirements of laws and regulations, promptly inform you of the basic situation and possible impact of the security incident, the measures we have taken or will take to deal with it, suggestions for you to prevent and reduce risks on your own, and remedial measures for you. We will promptly inform you of the relevant circumstances of the incident by email, letter, telephone, push

notification, etc., and if it is difficult to inform the user information subject one by one, we will take reasonable and effective measures to make an announcement. At the same time, we will also take the initiative to report the handling of user information security incidents to the requirements of the regulatory authorities.

## **5. Your rights**

By relevant laws, regulations, standards, and common practices in other countries and regions, we protect you to exercise the following rights over your user information:

### **(1) Access to your user information**

You have the right to access your user information, except for exceptions provided by laws and regulations. If you want to exercise your right to access your data Feel free to get in touch using our in-app form or email us at [support@ohupfitness.com](mailto:support@ohupfitness.com)

We will respond to your request for access within 30 days.

We will provide you with other user information generated during your use of our products or services, as long as we do not need to invest too much. If you want to exercise your right to access your data

Please send an email to [support@ohupfitness.com](mailto:support@ohupfitness.com)

### **(2) Correct your user information**

You have the right to request that we correct the user information we process about you when you find that there is an error. You may submit a request for correction in the manner listed in "(1) Access to your user information". If you are unable to correct this user information via the link above, you can contact us at any time using our web form or by sending an email to [support@ohupfitness.com](mailto:support@ohupfitness.com)

We will respond to your correction request within 30 days.

### **(3) Delete your user information**

You may request us to delete your user information under the following circumstances:

- 1). If our processing of user information violates laws and regulations;
- 2). If we collect and use your user information without your consent;
- 3). If our processing of user information violates the agreement with you;
- 4). If you no longer use our products or services, or you cancel your account;
- 5). If we no longer provide you with products or services.

We will evaluate your deletion request and, if the appropriate requirements are met, we will take appropriate steps to deal with it. When you make a deletion request to us, we may ask you to verify your identity to protect the security of your account. When you delete information from our Services, we may not immediately delete the corresponding information from our backup system due to

applicable legal and security technologies, and we will securely store your information until the backup can be erased or anonymized.

(4) Change the scope of your authorization and consent

Each business function requires some basic user information to be completed (see "Part I" of this Policy). For the collection and use of user information, you can give or withdraw your authorization and consent at any time.

After you withdraw your consent, we will no longer process the corresponding user information. At the same time, please note that your withdrawal of authorization and consent may lead to certain consequences, such as we may not be able to continue to provide you with corresponding services or specific functions, but your decision to withdraw your consent will not affect the previous processing of user information based on your authorization.

(5) The user information subject cancels the account

You may cancel your previously registered account at any time, and after canceling your account, we will stop providing you with products or services and delete or anonymize your information according to your requirements, unless otherwise provided by laws and regulations. This may also result in you losing access to the data in your account, so please exercise caution.

(6) The user information subject obtains a copy of the user information

You have the right to obtain a copy of your user information, and we may also directly transfer a copy of your user information to a third party designated by you at your request, where technically feasible, such as data interface matching.

(7) Restraining information systems from making automated decisions

In some business functions, we may only make decisions based on non-human automated decision-making mechanisms, including information systems, algorithms, etc. If these decisions significantly affect your legitimate rights and interests, you have the right to request an explanation from us, and we will also provide appropriate remedies.

(8) Respond to your above requests

For security purposes, you may be required to provide a written request or otherwise prove your identity. We may ask you to verify your identity before processing your request.

We will respond within thirty days.

In principle, we do not charge a fee for your reasonable request, but we will charge a certain cost fee for repeated requests that exceed reasonable limits due to repeated requests. We may reject unreasonably repetitive requests, require excessive technical means (e.g., need to develop new systems or fundamentally change current practices), pose risks to the legitimate rights and interests of others, or are very impractical. Please also understand that due to security

considerations, requirements of relevant laws and regulations, or technical limitations, we may not be able to respond to some of your requests, such as the following situations:

- 1). It is related to the performance of the obligations stipulated by laws and regulations by the user information controller;
- 2). Directly related to national security and national defense security;
- 3). Directly related to public safety, public health, or major public interests;
- 4). Directly related to criminal investigation, prosecution, trial, and enforcement of judgments;
- 5). The user information controller has sufficient evidence to show that the user information subject has subjective malice or abuses rights;
- 6). to protect the life, property, and other major legitimate rights and interests of the user information subject or other individuals, but it is difficult to obtain the consent of the person;
- 7). Responding to the request of the user information subject will cause serious damage to the lawful rights and interests of the user information subject or other individuals or organizations;
- 8). Involving trade secrets.

## **6. How We Process Children's Personal Information**

We take the protection of children's personal information very seriously, and our products, websites, and services are primarily intended for adults. Children should not create their user accounts without parental or guardian consent. Although local laws and customs define a child differently, we consider anyone under the age of 14 to be a child.

For the collection of child user information with the consent of parents or guardians, we will only store, use, or publicly disclose this information as permitted by law, with the explicit consent of parents or guardians, or as necessary to protect children, otherwise, we will try to delete the relevant data as soon as possible.

Given the limitations of existing technology and business models, it is difficult for us to actively identify children's personal information, if you find that we have collected children's personal information without our knowledge or the prior consent of a verifiable guardian, you can contact us promptly, and we will try to delete it promptly after discovery, and if we find the aforementioned circumstances ourselves, we will also delete it promptly, except for those required by law for us to retain.

## **7. How your user information is stored and how it is transferred globally**

In principle, the user information we collect and generate in a specific country will be stored within the territory of the specific country. We will only retain your user information for the purposes and purposes described in this Policy and for the shortest period stipulated by laws and regulations, and after the above retention period, we will delete or anonymize your user information by the



requirements of applicable laws and regulations. We may need to retain relevant data for a longer period unless otherwise provided by laws and regulations, or for public interest, scientific and historical research, or otherwise authorized by you.

Since we provide products or services through resources and servers all over the world, this means that after obtaining your authorization and consent, your user information may be transferred to or accessed from the foreign jurisdictions of the country/region where you use the products or services.

Such jurisdictions may have different data protection laws, or may not have such laws at all. In such cases, we will ensure that your user information is adequately and equally protected in different countries and regions. For example, we may ask for your consent to the cross-border transfer of user information, or implement security measures such as data de-identification before cross-border data transfers.

## **8. How this Policy is Updated**

Our Privacy Policy is subject to change. Without your express consent, we will not reduce your rights under this Privacy Policy. We will post any changes to this policy on this page.

We will also provide more prominent notices for major changes. The material changes referred to in this policy include but are not limited to:

- 1). Our service model has undergone major changes. Such as the purpose of processing user information, the type of user information processed, how user information is used, etc. ;
- 2). We have undergone major changes in our ownership structure and organizational structure. Such as business adjustment, bankruptcy mergers and acquisitions, etc.
- 3). Changes in the main objects of user information sharing, transfer, or public disclosure;
- 4). There are major changes in your rights to participate in the processing of user information and the way you exercise them;
- 5). When there is a change in the department, contact information and complaint channel responsible for handling user information security;
- 6). When the user information security impact assessment report indicates that there is a high risk.

We will also keep previous versions of this Policy on file for your review.

## **9. How to contact us**

If you have any questions, comments, or suggestions about this Privacy Policy, please contact us at:

E-mail: [official@ohupfitness.com](mailto:official@ohupfitness.com)

Generally, we will reply within 30 days.