

PRIVACY POLICY

Welcome to Ryvalfit!

Ryvalfit is owned and operated by RYVAL SOLUTIONS SPAIN, S.L.

Ryvalfit values your privacy and the protection of your personal data. This privacy policy describes what information we collect from you, how we collect it, how we use it, how we obtain your consent, how long we keep it in our databases and, if necessary, with whom we share it.

By using the platform, you are accepting the practices described in this privacy policy. The use of the platform is also subject to our terms and conditions. In this privacy policy, the words "platform" refer to the Ryvalfit mobile application, the web application and the Ryvalfit website together, "we", "us", "our", and "Ryvalfit", refers to RYVAL SOLUTIONS SPAIN, S.L, and "you", and "user", refers to you, the Ryvalfit user.

This privacy policy may change from time to time. Your continued use of the platform after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

This privacy policy has been developed and is maintained in accordance with all applicable national and international privacy and data protection laws and regulations and specifically, the General Data Protection Regulation (GDPR - European regulations).

1. GENERAL INFORMATION

The personal data of the users that are collected and processed through the platform:

- **Ryvalfit mobile application (Available on Google Play and App Store).**
- **Ryvalfit web application (<https://app.ryvalfit.com>)**
- **Ryvalfit website (<https://www.ryvalfit.com>)**

Will be under responsibility and in charge of:

- **RYVAL SOLUTIONS SPAIN, S.L.**
- **Email: ryvalfit@gmail.com**

2. HOW WE OBTAIN YOUR CONSENT

By using the Ryvalfit platform, the user acknowledges and agrees that they provide their consent for the processing of their personal data as established in this Privacy Policy and in compliance with applicable data protection regulations, including the General Data Protection Regulation (GDPR). The legal basis for obtaining consent is based on Article 6(1)(a) of the GDPR, which states that data processing is lawful when the data subject has given his or her consent to the processing of his or her personal data for one or more specific purposes.

Consent is given when the user performs any of the following actions:

- Visits the Ryvalfit website, where certain data is automatically collected through cookies and similar technologies, in accordance with our Cookies Policy.
- Downloads and installs the mobile application, which involves the collection of technical information about the device, unique identifiers and usage data.
- You register as a user on the platform, providing personal information such as name, email, phone number and payment details if you subscribe to a payment plan.
- You use the functionalities available on the platform, including creating and customizing training plans, exporting plans in PDF format, consulting the exercise database, planning activities in the calendar and monitoring your clients' progress.
- Purchase a subscription on the platform, which requires the processing of financial and billing information.
- Communicate with Ryvalfit through the contact details provided on the platform, including support queries, requests for assistance or any other voluntary communication involving the stream of personal data.

The user has the right to **withdraw their consent at any time**, without affecting the legality of the processing based on the consent given prior to withdrawal. To exercise this right, the user can send a request using the contact details indicated in this Privacy Policy. However, withdrawing consent may affect access to and use of certain features of the platform.

3. TYPES OF DATA COLLECTED

Ryvalfit collects different types of personal data when the user interacts with the platform through its website, mobile application and web application, including, but not limited to, creating an account, using its functionalities, purchasing subscriptions and communicating with Ryvalfit. The types of data that may be collected are detailed below:

a. Personal Data:

- Full name
- Email address
- Telephone number
- Profile information, such as profile photo or username

b. Registration data:

- Login credentials (email and password)
- Account identifiers generated by the platform
- Registration date and time

c. Payment and Billing Data:

- Payment card information (processed by third-party payment providers)
- Billing address
- Payment and subscription history

d. User Content:

- Training plans and templates created by the user
- Data entered in training plans and calendars
- Messages and communications sent through the platform
- Files exported in PDF or other compatible formats

e. Body Metrics and Related Information

- Height, weight and age of the user
- Body mass index (BMI) and body fat percentage (if entered manually by the user)
- Data on training goals, volume of physical activity and training progress
- Information on dietary habits, food preferences and recorded calorie intake

f. Usage Data:

- Functionalities used within the platform
- Frequency of and interaction with the tools and services offered
- Platform activity and usage times

g. Data Automatically Collected by the Platform:

- IP address and approximate location based on the IP address
- Type of device, operating system and version of the application used
- Language settings and user preferences
- Error information and crash logs for service improvement

h. Analytics data:

- Performance data and platform usage metrics
- Navigation patterns and behavior within the application and website
- Anonymized data used to improve the user experience and optimize services

i. Contact and Support Data:

- Information provided in queries, requests for assistance or complaints
- Communications sent by the user via email, contact form or other service channels
- Responses and feedback collected in surveys or satisfaction forms

4. HOW LONG WE KEEP YOUR DATA

Personal data provided by users through the platform will be retained for the time necessary to fulfil the legitimate purposes described in section 5 of this policy and/or until the user stops using the platform, uninstalls the app or requests the deletion of their data. Ryvalfit may retain personal data for a longer period provided that the user has given consent to such processing, as long as such consent is not withdrawn. In addition, Ryvalfit may be obliged to retain personal data for a longer period if required to do so in order to comply with a legal obligation or by order of an authority. Once the retention period has expired, the personal data will be deleted. Therefore, the right of access, the right of deletion, the right of rectification and the right of data portability cannot be asserted after the retention period has expired.

5. HOW WE USE YOUR INFORMATION (LEGITIMATE PURPOSES)

Ryvalfit collects, stores and processes user information for the purpose of providing and improving its services, ensuring the security of the platform and offering an optimized experience. The legitimate purposes for each category of data collected are detailed below:

a. Personal Data

- Create and manage the user's account on the platform.
- Personalize the user experience, including profile settings and communication within the platform.
- Send notifications, updates and relevant communications about the account and services.

b. Registration Data

- Allow secure access to the platform through user credentials.
- Keep records of account activity to manage sessions and prevent unauthorized access.
- Facilitate account recovery in case of lost credentials.

c. Payment and Billing Data

- Process payments and manage subscriptions to the platform's services.
- Issue invoices and receipts according to the transactions carried out by the user.
- Prevent fraud and guarantee the security of financial transactions.

d. User Content

- Allow users to create, modify and manage personalized training plans.
- Facilitate the export and sharing of training plans in different formats.
- Store and organize the information entered in the platform for later access and management.

e. Body Metrics and Related Information

- Offer tools to monitor progress in training and fitness goals.
- Provide information on the user's physical condition based on the data entered.
- Allow for the personalization of training plans and activity recommendations.
- Facilitate the monitoring of dietary habits and caloric intake in order to optimize physical performance.

f. Usage Data

- Analyze user behavior within the platform to improve functionality and usability.
- Offer recommendations and optimize available tools based on user interaction.
- Identify trends in the use of the platform to develop new functionalities and improve existing ones.

g. Data Automatically Collected by the Platform

- Ensure the proper functioning of the platform on different devices and operating systems.

- Detect and resolve technical errors, as well as improve the performance of the service.
- Ensure the compatibility and accessibility of the platform in different digital environments.

h. Analytics Data

- Evaluate the performance of the platform and improve the user experience.
- Identify usage patterns and areas for improvement in the interface and functionalities.
- Apply optimization processes based on the general behavior of users.

i. Contact and Support Data

- Respond to queries, requests for assistance and user complaints.
- Manage communications with users regarding incidents, technical support and platform updates.
- Collect user feedback to improve the quality of the service.

6. HOW WE SHARE INFORMATION

The personal information of our customers and users is an important and fundamental part of our platform. Under no circumstances will we sell or share information with third parties that has not been previously authorized by the user or owner of the personal data. We share user information only and exclusively as described below.

a. Third-Party Service Providers. We use third-party services to perform certain functions on our platform. Some of these functions and services include: hosting the mobile application in the application stores (App Store and Google Play), hosting the website, processing payments (Stripe), data storage services, sending emails, and performing tracking and analysis functions on the platform.

These third-party services and tools may have access to personal information needed to perform their functions, but may not use that information for other purposes. Information shared with these third-party services will be treated and stored in accordance with their respective privacy policies and our privacy policy.

b. Data storage: Ryvalfit may transfer and store certain personal data of users to third-party service providers to the extent necessary for the operation of the platform. In particular, we use the storage and authentication services of Azure AD B2C, a solution provided by Microsoft, to manage access to and security of user accounts.

As part of this service, the following personal data is stored in Azure AD B2C: email address, first name and surname. This data is stored on servers located in the European Union, guaranteeing adequate security measures for the protection of the information.

Microsoft, as the provider of Azure AD B2C, acts as a data processor and applies security and privacy standards in line with industry best practices. For more information on how Microsoft protects data stored in Azure AD B2C, please review its Privacy Policy, available at the following link: <https://privacy.microsoft.com/en-us/privacystatement>.

c. Payment processing: Ryvalfit uses the payment processing services of Stripe to manage transactions made within the platform. Stripe acts as a payment service provider and is responsible for the secure processing of payment data of users who purchase a subscription.

When making a payment through Ryvalfit, the user's financial data, such as payment card information, is processed directly by Stripe, without Ryvalfit storing or having access to such information. Stripe implements advanced security measures for data protection and compliance with applicable payment processing regulations.

For more information on how Stripe protects user data, please review their Privacy Policy, available at the following link: <https://stripe.com/privacy>.

d. Notifications and communications: Ryvalfit can send automatic notifications through the website and the application, and communications by email to keep users informed about updates, activities, and other relevant aspects of the platform. For this purpose, users' contact details, such as their email address, may be shared with third-party services specializing in sending automatic notifications and emails.

Users have the option of managing notifications through their user account settings, where they can enable or disable notifications according to their preferences. In the case of emails, they can also choose not to receive additional communications by using the “unsubscribe” option available in certain emails.

Ryvalfit undertakes to use contact details only for purposes related to the activities of the platform and to ensure that any third-party services managing such communications comply with applicable data protection and confidentiality regulations. Users can contact Ryvalfit if they need additional help managing their notification or communication preferences.

e. Business Transfers. In the event that Ryvalfit creates, merges with, or is acquired by another entity, your information will most likely be transferred. Ryvalfit will email you or place a prominent notice on our platform before your information becomes subject to another privacy policy.

f. Protection of Ryvalfit and others. We release personal information when we believe release is appropriate to comply with the law, enforce or apply our Terms and conditions and other agreements, or protect the rights, property, or safety of Ryvalfit, our users or others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

g. With Your Consent. Other than as set out above, you will receive notice when personally identifiable information about you might go to third parties, and you will have an opportunity to choose not to share the information.

7. PROTECTING YOUR INFORMATION

We grant access to your personal information only to those outside persons or services that have a legitimate need to know it and in accordance with our privacy policy. We adhere to industry-recognized security standards to protect your personal information, both during

transmission and in storage. However, it is important to note that no method of transmission over the Internet or electronic storage is foolproof and 100% secure. Therefore, while we at Ryvalfit strive to implement commercially viable data protection methods, we cannot ensure absolute security of your personal information. We undertake not to sell, distribute or transfer your personal data to unauthorized third parties, unless we have your explicit consent or are required by law to do so.

8. DATA BREACH NOTIFICATIONS

In the event of a security breach that compromises the confidentiality of our users' personal data, Ryvalfit undertakes to notify those affected in a timely manner. This notification will be made through the means of contact that have been provided by the user on our platform. We will take all reasonable measures to protect the information and remedy any situation that compromises the security of your data.

9. INTERNATIONAL DATA TRANSFER

Ryvalfit may transfer users' personal data outside the European Economic Area or their country of origin due to the use of hosting, storage and processing services provided by third parties that operate servers located in different countries. These transfers are necessary to guarantee the continuous functioning of the platform and provide an efficient user experience. Although Ryvalfit is based in Spain, the technological infrastructure used may involve data being stored or processed in jurisdictions with data protection laws that differ from those in Europe or your country of origin.

Ryvalfit is committed to ensuring that all international transfers of personal data comply with applicable data protection regulations, including appropriate security measures to safeguard user information. This includes, but is not limited to, the implementation of standard contractual clauses, the assessment of the adequacy of data protection in the receiving country, and compliance with applicable privacy regulations in third-party services.

By using Ryvalfit, users consent to the transfer, storage and processing of their data on servers located outside their country of residence, recognizing that such transfers are necessary for the operation of the platform. Ryvalfit undertakes to take all reasonable measures to protect the integrity and security of personal data during such international transfers.

10. RIGHTS

Users who provide information through our platform, as data subjects and data owners, have the right to access, rectify, download or delete their information, as well as to restrict and object to certain processing of their information. While some of these rights apply generally, others apply only in certain limited circumstances. We describe these rights below:

- **Access and portability:** to access and know what information is stored in our servers, you can send us your request through our contact information.
- **Rectify, Restrict, Limit and/or Delete:** You can also rectify, restrict, limit or delete much of your information.
- **Right to be informed:** Users of our platform will be informed, upon request, about what data we collect, how it is used, how long it is retained and whether it is shared with third parties.
- **Object:** When we process your information based on our legitimate interests as explained above, or in the public interest, you may object to this processing in certain circumstances. In such cases, we will stop processing your information unless we have compelling legitimate reasons to continue processing it or where it is necessary for legal reasons.
- **Revoke consent:** Where you have previously given your consent, such as to allow us to process and store your personal information, you have the right to revoke your consent to the processing and storage of your information at any time. For example, you may withdraw your consent by updating your settings. In certain cases, we may continue to process your information after you have withdrawn your consent if we have a legal basis for doing so or if your withdrawal of consent was limited to certain processing activities.
- **Complaint:** If you wish to file a complaint about our use of your information (and without prejudice to any other rights you may have), you have the right to do so with your local supervisory authority. Users can exercise all these rights by contacting us through the contact information or the contact page.
- **Rights related to automated decision-making, including profiling:** users may request that we provide a copy of the automated processing activities we conduct if they believe that data is being unlawfully processed.

Users or holders of personal data provided through the platform may exercise these rights over their personal data at any time and without limitation by sending their request through our contact information or contact form. The request to exercise their rights will be attended and answered within a maximum period of **10 working days**.

11. CHILDREN'S ONLINE PRIVACY PROTECTION

We comply with the requirements of national and international data protection regulations regarding the protection of personal data of minors. We do not collect any information from children under the age of 13 (minimum age allowed to collect and process information without parental or legal guardian consent). If we become aware that a child under the age of 13 has provided us with personal information, we will take steps to delete such information.

12. THIRD PARTIES

Except as otherwise expressly included in this privacy policy, this document addresses only the use and disclosure of information that Ryvalfit collects from you. If you disclose your information to third parties, whether other users or third parties, different rules may apply to their use or disclosure of the information you disclose to them. Ryvalfit does not control the

privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. Ryvalfit is not responsible for the privacy or security practices of other websites, platforms or services, including those linked from our platform. Please review the privacy policies of any third-party websites, platforms or services you access through the Ryvalfit platform.

13. CHANGES TO PRIVACY POLICY

We reserve the right to change our privacy policy at any time. Changes will be promptly notified to our users through any electronic means and posted on the platform. Your continued use of our platform following such changes will signify your acceptance of the changes.

14. CONTACT US

If you have questions or concerns about these privacy policy and the handling and security of your data, please contact us through our contact information below:

RYVAL SOLUTIONS SPAIN, S.L..

Email: ryvalfit@gmail.com