

# ROADGRANDTOURS INC. PRIVACY POLICY

Effective May 24, 2018

Updated 01/06/2021

RGT Cycling is a virtual cycling simulator. We create virtual cycling experiences such as (but not limited to) races, group rides, and structured workouts to help you get fitter faster on stronger whilst connecting to other users from around the world using the internet.

RGT is a social platform, your profile information, including personal details such as location data, power data, and general information that relate to your activities are shared with other RGT Cycling Users.

When additional and explicit consent is obtained, your information may be shared with other services to enable additional user interaction and further activity analysis.

Your privacy is important to us, it is also important that you understand how we collect, use, and share your personal information we obtain when you use our website and applications.

To meet our requirements under data protection legislation and to ensure we are giving our users the best experience we may, from time to time, make changes to the Privacy Policy. We will make you aware of this by changing the revision date associated with this document. When significant changes are made we may also announce these changes on our website or within the RGT Cycling applications.

The content of this document is designed to inform you about how your information is collected, processed, and shared. If anything remains unclear please contact [social@rgtcycling.com](mailto:social@rgtcycling.com) and provide details of your query.

## Collection of Information

### Information You Provide to Us

To ride on RGT Cycling, you are required to create an account. To create an account, you need to provide:

1. Your first and last name
2. Your surname
3. Your email address

The first time you sign in we add default or zero values to some personal information fields such as:

1. Date of birth
2. Country
3. Height
4. Weight
5. Functional Threshold Power
6. Preferred Unit of measurement

This information should be updated to represent your personally relevant details to ensure you and those riding with you have the most realistic and fair experience possible.

We also collect additional information on what type of sport you are interested in, details of training objectives, and avatar customization preferences.

Excluding your email address, the information you provide to us is shared publicly so give personally identifiable information due consideration when creating your account and selecting your personal details.

In-app communications such as chat transcripts are stored to ensure standards and behaviors are met. These may be released for wider consideration.

When subscribing to the RGT Cycling premium subscription your Payment preferences are stored to provide you with access to this service.

### Information About Your Activities

When you train and ride on RGT Cycling, we collect information about that activity, this will include, but is not limited to:

1. The road you ride
2. How far you ride
3. How long you ride
4. Your elevation data
5. Your power data
6. Your cadence data
7. Your heart rate data
8. The start order of any event
9. The finish order of any event

10. The start and finish times of rides
11. Experience points
12. Unlocked equipment and completed gamification elements
13. Training Stress Score
14. Changes in performance measures such as Functional Threshold Power
15. Those you ride with
16. In-App Branding such as fences and billboards you see
17. Segments completed and their times
18. In ride gestures such as waves
19. Hardware and equipment used

A selection of this data (primarily results and performance-based information) is shared with rgtdb.com to provide event and series results standings.

#### Automatically Collected Information

When you access or use the RGT website and web portal, RGT Cycling and its partners may automatically collect information about you, including:

1. Information collected by log files. This is collected when using the RGT Cycling applications, it is used to help us bug fix and solve problems. It includes:
  - a. Phone details
  - b. Tablet details
  - c. Computer details
  - d. Network provider details
  - e. Operating system details
  - f. Device information details
  - g. App version details
  - h. Pages viewed and interacted with
2. Information collected by cookies and other web tracking services such as pixels and beacons. "Cookies" are simple text files stored on your computer for use by your browser.

These are collected when using the RGT Cycling website and are used to improve RGT Cyclings' ability to promote the right kind of material to you and others.

#### Information We Collect From Other Sources

If you choose to link RGT Cycling to third-party services we may have access to some information about how you use this service. This is used to provide you with the required service and can be used to improve your experience with RGT Cycling and the partner services. It may be used by RGT Cycling and/or the partner service to improve their ability to promote the right

kind of material to you and others. This is undertaken in accordance with your privacy agreement with the associated partner.

## Use of Information

The information you share and that we collect is used to maintain and improve the services we offer to you and others. We also use the information we collect to:

1. Provide you with the service to which you are sharing the information for, for example:
  - a. Creating an account
  - b. Joining an event
  - c. Starting a workout
  - d. Sending a message.
2. Send details about app updates, and changes to our terms of use, and privacy policy
3. Provide support to customer service enquires and error reports
4. Improve and personalize your experience and provide advertisements, content, or features that match user profiles or interests
5. Share relevant information with you about:
  - a. RGT Cycling events
  - b. Offers
  - c. News
  - d. Event registration
  - e. Event changes and cancellations
6. Create rankings, league boards, and leaderboards
7. Analyze trends and monitor usage to provide insight and support for future products and services
8. Detect, investigate, and deter sinister and illegal activities
9. Administer contests, competitions, and process and deliver entries and reward

## Location Data

The RGT Cycling app collects location data in the background. This is done when we enable Bluetooth operations. We never share location data collected in this way with third parties.

## Ride Fare

If you are reported for or suspected of data manipulation for the purpose of enhancing your performance, we will share your data associated with competition and performance with third parties for the sole purposes of analysis and judgment, including but not limited to:

1. First name
2. Surname
3. Functional Threshold Power
4. Bodyweight

5. Height
6. Equipment
7. Proof of Calibration
8. Date of birth

If the complaint or suspicion is upheld you will be accountable for sanctions as determined by the reviewing organizer and RGT Cycling.

RGT Cycling also reserves the right to cancel and/or terminate access to any individual by any and all means possible if they are found to have acted not in the interest of fairness and transparency.

If further validation is required you may be contacted by RGT Cycling to provide proof of performance, calibration, and weight.

## Sharing of Information

### Sharing With Other RGT CYCLING USERS

When you use RGT Cycling Services, we share information about you with other users. This happens when you are working out and after the activity has been finished. The information we share includes

1. Your first name
2. Your last name
3. The country you have selected to associate with
4. Gender
5. Height
6. Weight
7. Age
8. Performance details such as power and heart rate measurements
9. Segment times and personal bests
10. Level or ranking
11. Position in events
12. Workout type
13. Chat messages
14. Calculated metrics e.g. Watts per Kilogram

### Publications, Broadcasts, and Live Streams

RGT Cycling, RGT Cycling partners, and other RGT Cycling users may use recordings or live streams of any event, ride, or activity for promotional purposes or for the simple purpose of sharing video feeds or recordings of events, races, or activities.

## Sharing Information with Third Parties

RGT Cycling enables users to connect to third-party platforms such as Strava and TrainingPeaks. Information shared as part of these integrations is done so in accordance with the third-party's privacy policy.

We do not sell your personal information.

We may also share your personal information for one or more of the following reasons

1. As part of any negotiations for the acquisition, merger, or investment in RGT Cycling
2. If we feel your behavior contravenes our End Users License Agreement, Privacy Policy or is generally undesirable
3. To abide by requests from law enforcement
4. With consultants and service providers who need to access such information to complete work on our behalf
5. For review in accordance with Ride Fare

We will proactively seek your permission if we intend to share information with relevant brand partners for additional marketing purposes in the form of an extra opt-in option.

## Sharing Aggregated Data

Anonymized reports of RGT Cycling usage will be produced and shared publicly. Your explicit personally identifiable information will never be shared.

## Advertising and Analytics Services Provided by Others

We provide ad companies with information that allows them to serve you with more useful and relevant RGT Cycling ads and to measure their performance. We never share your name or other information that directly identifies you when we do this. Instead, we use an advertising identifier like a cookie.

## Data Retention

We keep your personal information to enable your continued use of RGT Cycling Services, for as long as it is required in order to fulfill the relevant purposes described in this Privacy Notice, as may be required by law such as for tax and accounting purposes, or as otherwise communicated to you. For example, we retain your activity history so that you can review past performance to assess your personal development.

## Your Choices

If you have any questions or objections as to how we collect and process your personal information, please contact us ([social@rgtcycling.com](mailto:social@rgtcycling.com)). You may also select how some services work.

### Account Information

You can update the personal information associated with your account by logging into your RGT Cycling account at any time and updating your details. If you want to change details that are not available in your account details please contact [social@rgtcycling.com](mailto:social@rgtcycling.com) with details of what you would like to do.

### Delete Account

Please contact [social@rgtcycling.com](mailto:social@rgtcycling.com) to request your details and your account is deleted.

### Cookies

Most internet browsers make it possible to enable or disable cookies each time you interact with the RGT Cycling website. It may also be possible to select global settings for how your web browser interacts with cookies in general, or just for the RGT website.

### Promotional Communications

Choosing to receive RGT promotional emails requires active consent. This means we do not assume you want to hear from us and that you must make a conscious action, with which you agree to receive this kind of communication.

You can choose to opt-out of receiving these emails at any time by clicking the unsubscribe button in the emails or in your profile settings on the app. If you do choose to opt-out of promotional emails we will still continue to send you information that relates to your account and some interactions with our services, such as:

1. Event entry confirmation
2. Event entry reminders
3. Changes in event times and their cancellation
4. Important notice about RGT Cycling and your account
5. Magic Road uploads
6. Password reset emails
7. Changes to your subscription

## Mobile Push Notifications/Alerts

We may send promotional and non-promotional push notifications or alerts to your mobile device.

## Right to Withdraw Consent

You can withdraw your consent to process your data at any time by contacting us at [social@rgtcycling.com](mailto:social@rgtcycling.com)

## Data Security

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. While we strive to use commercially acceptable means to protect your personal information, no method of transmission over the Internet, or method of electronic storage, is 100% secure and we cannot guarantee its absolute security.

In the event of an inadvertent disclosure of your personal information, we will take all commercially reasonable steps to limit and remedy the disclosure as required by applicable law. If you have any questions about the security of our Site and the Game, you can contact us via email at [social@rgtcycling.com](mailto:social@rgtcycling.com)

## Age Limitation

This Site and the Game are not directed to a person under the age of 18. If you become aware that your child has provided us with personal information without your consent, please contact us at [social@rgtcycling.com](mailto:social@rgtcycling.com).

We do not knowingly collect or solicit information from, market to or accept services from persons under 18 years old. If we become aware that a person under 18 has provided us with personal information, we take steps to remove such information.

## Effective Date; Policy Changes.

Each time you use the Site and the Game, the current version of the Policy will apply. Accordingly, when you use the Site or the Game, you should check the date of this Policy (which appears at the top of the Policy) and review any changes since the last version.

Our business changes frequently and this Policy is subject to change from time to time. You are encouraged to check the Site regularly for any changes to this Policy. Unless stated otherwise, our current Policy applies to all information that we have about you. We will not materially

change our policies and practices to make them less protective of customer information collected in the past without the consent of affected customers.

## Governing Law.

This Policy is governed by the laws of the State of Delaware, U.S.A. without giving effect to any principles of conflict of law.

## Transfers of Information

### Transfers Outside of the EEA

In order to provide you with access to the RGT Cycling platform and access the agreed services the information that we collect from you will be transferred to and stored in destinations outside of your country and the European Economic Area (“EEA”).

To facilitate the lawful transfer of personal data outside of the EU including to our vendors. We rely on the Commission’s standard contractual clauses

### EU-US Privacy Shield

We do not currently participate in the voluntary EU-US privacy framework.

## Additional Rights of EEA (European Economic Area) Residents

If you are a resident of a country in the EEA, you have the rights, among others, to

1. Access your personal data
2. Ensure the accuracy of your personal data
3. The right to have us delete your personal data
4. The right to restrict further processing of your personal data
5. The right to complain to a supervisory authority in your country of residence in the event that data is misused

If you believe that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.

You may do so in the EU member state of your residence, your place of work, or the place of the alleged infringement.

You may exercise any of your rights in relation to your personal data by written notice to us addressed to the following:

James Vickers  
Road Grand Tours, Inc  
7718 Tesson Drive, Saint Louis, MO, 63123,  
United States, Saint Louis

## Your California Privacy Rights

California Civil Code Section 1798.83 permits customers who are California residents and who have provided the Company with “personal information” to request certain information about the disclosure of that information to third parties for their direct marketing purposes. If you are a California resident with questions regarding this, please contact us at [support@rgtcycling.com](mailto:support@rgtcycling.com)

## Contact Us

To contact us with your questions or comments regarding this Policy or the information collection and dissemination practices of the Site or the Game, please email us at [support@rgtcycling.com](mailto:support@rgtcycling.com)