

Fellsway Group, LLC

Privacy Policy

Pathway to Risk Intelligence (P2RI) is a Trademark of FELLSWAY Group, LLC (“FELLSWAY”). FELLSWAY is committed to respecting the privacy rights of website visitors. The following policy describes the information we collect about you and your use of our website and mobile applications, how we use, protect, and share your information, and the choices you have relating to your information.

WHAT INFORMATION DO WE COLLECT?

We collect information from you when you register an account, order products, enter contests, or otherwise provide us with your information. The information we may collect from you includes your name, e-mail address, mailing and billing address, website username and password, phone number, payment information, purchase history, product sizing information and other information we may request from you or you may provide to us, including information used to facilitate the processing of your orders, warranty requests or images of your body which we use to gather measurements on appropriate product sizes.

Like many websites, we use various technologies to collect information when you access or use the website, as further described in the “Cookies” and Similar Technologies section below. The information collected through these technologies includes online identifiers such as IP address, device ID, browsing activity, referring websites, and links clicked.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect from you to do one or more of the following:

To fulfill orders, validate payments, and allow for repeat ordering

To process warranty requests or locate shipments

To allow us to better service you and respond to your customer service requests

To communicate with you about our products, services, and promotions

To provide details around fit and product sizing

To learn about site visitors and customers so we can tailor content, features, and functionalities to better serve your preferences

To research, develop, and improve our website, mobile applications, and online services

Visitors who register on our website, mobile applications or participate in our marketing programs will be given a choice to opt-in to our e-mail marketing list and receive marketing e-mail communications from FELLSWAY or to opt-out and choose not to receive email marketing communications from FELLSWAY. If you opt-in to receive FELLSWAY e-mails, we may send you periodic e-mails from FELLSWAY. If you opt-out, you will not receive these e-mails.

HOW DO WE PROTECT YOUR INFORMATION?

We use a variety of technical, administrative and organizational security measures, including encryption of data, to maintain the safety of your personal information. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and receive training on data protection. Despite our efforts, no website, mobile application, or computer system is 100% secure or “hacker proof” so we cannot guarantee your information will never be accessed, used, or disclosed without authorization.

"COOKIES" AND SIMILAR TECHNOLOGIES

“Cookies” are pieces of information that a site collects from your browser (like Google Chrome or Internet Explorer) while you are viewing and interacting with the site. Cookies are stored on your computer and work in combination with cookies within the site to capture and remember information about your use of the site. For instance, cookies are used to track your activity and understand your preferences based on previous or current site activity. This enables us to improve your site experience. We also use cookies to provide us with aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

Certain cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the site and, as such, will last longer. You may learn more about cookies by visiting <https://www.allaboutcookies.org>.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies. You may do this through your browser settings. Each browser is different, so look at your browser “help” menu to learn the correct way to modify your cookie settings. If you turn off cookies, you may not have access to features that make your site experience more efficient -- like the features mentioned above -- and some of our services may not function properly.

You can also adjust your tracking preferences on your mobile device through your device settings.

We may contract with third-party service providers to assist us in analyzing cookies and similar technologies. For example, we use Google Analytics to understand how our website performs and how you use it. These third parties can use cookies and other technologies to collect information, such as the browsers you use to access our site, websites viewed, time spent on websites, and links clicked.

To learn more about how Google processes your data, please visit <https://www.google.com/policies/privacy/>

To opt out of Google Analytics please visit <https://tools.google.com/dlpage/gaoptout>.

DO WE DISCLOSE THE INFORMATION WE COLLECT TO OUTSIDE PARTIES?

Except as described in this Privacy Policy, we generally do not sell, trade, or otherwise transfer to outside parties your personal information unless we provide you with advance notice and obtain your consent. However, we may disclose your information to our website hosting partners, payment

processors, FELLOWSHIP entities, and other parties who assist us in operating our website, fulfilling orders, conducting FELLOWSHIP's business, or servicing you. We may also share information about you in connection with a corporate merger, consolidation, or restructuring; the sale of substantially all of our stock and/or assets; financing, acquisition, divestiture, or dissolution of all or a portion of our business; or other corporate change. In addition, we may release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety.

Non-personally identifiable visitor information in aggregate form may be provided to third-parties for marketing, advertising, or other uses.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

Please be aware that some of the third-party service providers with whom we may share your information are located outside of the United States. As a result, your information may be transferred from another country into the United States or out of the United States to another country. Some of these countries (including the United States) may not have data protection laws as comprehensive or protective as those in your country of residence. To the extent required by applicable law, we ensure that international transfers of your information are subject to appropriate protections, such as standard data protection clauses approved by the European Commission.

LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We may process your information if any one of the following applies:

You have given your consent to the processing of your information for one or more specific purposes;

Processing is necessary for the performance of a contract with you and/or to take steps at your request prior to entering into a contract;

Processing is necessary for the purposes of the legitimate interests pursued by FELLOWSHIP or by a third party, as described in this Privacy Policy; or

Processing is necessary for compliance with a legal obligation to which FELLOWSHIP is subject.

We will gladly help to clarify the specific legal basis that applies to the processing of your information.

YOUR RIGHTS

FELLOWSHIP strives to make sure that the information we maintain is reliable, accurate, and up to date.

Upon request, we will provide you with a copy of the information we hold about you, to the extent required by law. You may also request, in accordance with applicable law, that we (i) update, correct, transfer, or delete your information, (ii) restrict or discontinue processing your information, or (iii) disclose to you (1) the categories of information we have collected about you, (2) the categories of sources from which we obtained the information, (3) the business purpose for collecting the information, and (4) the categories of third parties with whom we share information. Where we have obtained your consent to process your personal information, you have the right to withdraw your consent at any time. We will not discriminate against you for the exercise of these rights. To make a

request described above, please contact us at the e-mail address or phone number at the top of this page. If you contact us directly, we will take reasonable steps to confirm your identity before making any changes. Please note that some information remains in our records even after you request its deletion, to the extent permitted or required by applicable laws.

If you wish to opt-out of having your personal information used for advertising or marketing purposes, or to prevent your information from being shared with another organization consistent with this Privacy Policy, please e-mail us.

You may also unsubscribe from marketing e-mails that you receive from us at any time by clicking the “unsubscribe” link at the bottom of the e-mail. If you unsubscribe from marketing communications, however, it will not limit our ability to send transactional communications to you regarding products or services you have requested.

CHILDREN

We do not knowingly collect information online from children under the age of 13. If you are under the age of 13 you should not provide any personal information to us and you should use this website only with the participation of a parent or guardian. Please note that if, while attempting to register on our site, a user provides us with their date of birth indicating that they are under the age of 13, the system will reject the submission.

CHANGES TO OUR POLICY

If we decide to change our Privacy Policy, we will post those changes on this page. Policy changes will take effect when posted. This Policy was last modified in June 2021.