



PRIVACY STATEMENT

Privacy Statement Iron House Co.

This is the privacy statement for Iron House Co. B.V., Amsterdamsestraatweg 640, 3555HX, Utrecht, The Netherlands, registered at the chamber of commerce under the company registry number 6338548.

This privacy statement aims to be fully transparent on how we use your personal data and to ensure you that we are processing your personal data in compliance with the applicable data protection laws. We encourage you to read this privacy statement carefully so that you are aware of what kind and why we process your personal data.

1. Which personal data do we process and for which purpose?

When you visit our website and/or use our services, we will process some information about you. Below we explain what kind of personal data we use and why we need it.

Membership and Day Pass

When you sign up for a membership or use our facilities, we need certain personal data to complete your registration with Iron House Co. and to facilitate payments. This personal data consists of:

- *General information.* This includes full name, email address, gender, address, phone number, date of birth.
- *Financial information.* This includes name on bank card, account number, bank, holder place, consent for automatic debt collection.
- *Membership information.* This includes subscription form, student status, start and end date of your subscription, frequency of your visits, date and time of your visits.

Services

In addition to the memberships, Iron House Co. offers different services, including classes, custom programs, personal training and nutritional guidance. To perform these services, we will process some additional information about you, including:

- Fitness and nutritional goals and preferences;
- Body weight and other physical metrics;
- The chosen service, quantity of said service, payment method of choice and the date and time of payment;
- Usage of the classes such as which class (Power Hour and Powerlifting Classes) you have joined, which date, your contact information and the frequency of your participation;
- The frequency of your visits to the facility, the date and time.

In the case you provide us with fitness, nutritional and/or physical metrics and information, this personal data may reveal information regarding your health and/or religious beliefs. We only process this information for the services you have requested, if and to the extent such is necessary. We do not use this information for other services or purposes.

Website

When you visit our website (<https://ironhouseco.com>) we will automatically collect information about you. This information is used to facilitate your visit to our website, to secure and improve our website, and for marketing purposes, such as placing advertisements on our social media platforms and on the Google search engine. The collected information consists of:

- Your Internet Protocol address (IP-address);
- Your internet browser;
- Your operating system;
- Your behavior on and interaction with the website;
- Your location;
- A unique device or user ID;
- Date and time stamps;
- Referring website address;
- Websites you visit.

We collect this information by using cookies and similar technologies. A cookie is a small text file that is stored in a browser by a website which allows the website to recognize and remember the browser, user preferences and other information. Cookies do not harm your device or any files on your device. Before placing cookies that track your behavior or otherwise impact your privacy, we will ask your consent to place these cookies and use the personal data collected with these cookies.

If you wish to know more about the cookies we use, please read our [Cookie Statement](#).

Social Media

Iron House Co. provides you the option of sharing your experience with our gym on social media. For this purpose, our website offers social media plug-ins. When you use a social media plug-in to share or like content or comments, information regarding your account, such as name and profile picture, may be shared between Iron House Co. and the social media platform. Iron House Co. will only use this information in accordance with this privacy statement. To learn more about how your information is used by the social media platform, please consult their privacy policy.

In addition, we also like to share content and comments, including photos and videos taken at our gym, on Iron House Co. website and social media such as Facebook and Instagram. It may be the case that you are featured in such communications. If you feel uncomfortable about any content or comments shared by Iron House Co. or if you believe such content or comments violate your or a third parties rights, please contact us at info@ironhouseco.com.

Contact, newsletter and survey

You may contact us using the contact form or the chat option on the website, or by email or telephone. When you contact us, we will receive your contact information, such as name, email

address and/or telephone number, and any other information you provide to us during your communication with Iron House Co.

We also provide updates and news regarding our gym through our newsletter. We send our newsletter to our members (see below regarding membership) or if you have signed up to receive our newsletter on the website. If you do not wish to receive the newsletter, please let us know by sending an email to info@ironhouseco.com. An unsubscribe option is also provided in each of our newsletters.

Every once in a while, we like to ask our members and website visitors how they like our website, memberships and services, to see if we can make our website and services even better. For this purpose, we may send you a survey using SurveyMonkey, Google Forms and/or MailChimp. Participation in the survey is voluntary.

Legal ground

The legal ground for the processing of your personal data is that the processing is necessary for the conclusion and/or performance of our contract with you, or for the legitimate interests of Iron House Co. to provide, promote and improve its memberships and services. Also, Iron House Co. may need to process your personal data to comply with its legal obligations, or with request from competent authorities. Where a processing of personal data does not fall within the scope of these legal grounds, or if required to do so by law, we will ask your consent of the processing of your personal data.

If a processing of your personal data is based on consent, you have the right to withdraw your consent at any time, by sending an email to that extent to info@ironhouseco.com. We will discontinue the processing of your information upon receipt of your withdrawal. However, any processing performed prior to your withdrawal remains a legitimate processing based on a valid consent at the time. We will not be under the obligation to reverse the processing.

2. Do we share your personal data with third parties?

In some cases, it is necessary for Iron House Co. to share your personal data with third parties, if Iron House Co. uses services provided by such third parties in the course of its business operations. These services include a membership administration tool, automatic debt collection ('incasso'), class scheduling tool, hosting, administration and analyzing of our website, marketing and financial administration. We may also share your personal data with competent authorities if requested to do so by that authority.

3. How do we protect your personal data?

Iron House Co. takes reasonable steps to ensure that your personal data is securely processed. We use industry standard technical and organizational measures to protect your personal data from unauthorized or unlawful use, alteration, unauthorized access or disclosure, accidental or unlawful destruction and loss.

4. How long do we keep your personal?

Iron House Co. stores your personal data for as long as necessary to achieve the purpose for which the personal data was obtained. The exact duration of the storage may therefore differ, depending on the services you receive from Iron House Co. At the end of the storage period, your personal data will be anonymized or deleted.

5. Will information be transferred to countries outside the EU?

Due to technical and operational reasons Iron House Co. may transfer your information to third parties outside of the European Economic Area (“EEA”). This is the case if we use services of third parties vested outside the EEA, or if we are required to provide information to foreign authorities. The countries outside the EEA where these third parties are vested may not provide the same level of data protection as provided in the EEA. We will make sure the required measures to ensure the lawful transfer of your information are in place, for instance *Privacy Shield certification* or by entering into the *European Model Clauses*. If you wish to know more about these measures, please contact us at info@ironhouseco.com.

6. Your rights

With regard to your information that is collected and/or processed by Iron House Co., you may exercise the following rights:

- **Right of access**: you may request Iron House Co. to confirm if information about you is processed. If such is the case, you will receive access to your information.
- **Right of rectification**: if our information about you is incorrect, you may request us to rectify your information. This includes the right to have incomplete information completed, taking into account the purpose of the processing.
- **Right to erasure**: you may request us to erase your information, for instance if the information is unlawfully processed, or if you have withdrawn your consent.
- **Right to restrict processing**: you may request us to restrict the processing of your information, if (i) the information is inaccurate, (ii) the processing is unlawful, (iii) you need us to retain the information after the retention period for a legal claim, or (iv) you have objected to the processing and a verification of our legitimate interests is pending.
- **Right to data portability**: under circumstances, you may request us to provide you with an electronic file of your information, or to transfer your personal data to a third party if such is technically feasible.

We will respond to your requests without undue delay, but within one month. If permitted under applicable legislation, we may extend the response period with two further months if such is necessary due to the complexity and number of requests. We will notify you of any extension and the reason thereof. If we deny your request, we shall inform you of the reasons why.

You may (in addition to the rights above) lodge a complaint regarding the processing of your information by Iron House Co., or regarding the denial of a request as meant above, with the Dutch Data Protection Authority (‘Autoriteit Persoonsgegevens’).

7. Contact

If you have any questions, concerns, and/or would like to exercise one of your rights. Please do not hesitate contact us at: info@ironhouseco.com.

Last update: February 2019