

UNDER WRAPS PRIVACY POLICY

Last updated: April 29, 2024

This privacy policy has been compiled to better serve those who are concerned with how their Personal Information is being used online. Personal Information, as used in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personal Information in accordance with our website.

WHAT PERSONAL INFORMATION DO WE COLLECT FROM THE PEOPLE THAT VISIT OUR BLOG, WEBSITE OR APP?

When ordering or registering on our site, as appropriate, you may be asked to enter your name, email address, phone number, city/state/zip code or other details to help you with your experience.

WHEN DO WE COLLECT INFORMATION?

We collect information from you when you fill out a form or enter information on our site.

HOW DO WE USE YOUR INFORMATION?

We may use the information we collect from you when you register, provide your email address or phone number or any other contact information, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or use certain other site features in the following ways:

- To contact you regarding scheduling, class reminders, promotions, specials, or in other ways related to the Under Wraps business;
- To provide to third parties that may contact you on behalf, in connection with the Under Wraps business;
- To administer a contest, promotion, survey or other site feature; and/or
- To send periodic emails regarding your order or other products and services.

HOW DO WE PROTECT VISITOR INFORMATION?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

We use regular Malware Scanning.

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 are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.

We implement a variety of security measures when a user places an order enters, submits, or accesses their information to maintain the safety of your personal information.

All transactions are processed through a gateway provider and are not stored or processed on our servers.

DO WE USE 'COOKIES'?

Yes. Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us

remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We use cookies to:

- Understand and save user's preferences for future visits;
- Keep track of advertisements; and
- Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (like Internet Explorer) settings. Each browser is a little different, so look at your browser's "Help" menu to learn the correct way to modify your cookies.

If you disable cookies, some features of our website may be disabled. It will turn off some of the features that make your site experience more efficient and some of our services will not function properly.

However, you can still place orders even if you disable cookies.

Location or IP address information

THIRD-PARTY DISCLOSURE

In general, we do not sell, trade, or otherwise transfer to outside parties your Personal Information, except as described in this policy. Consistent with this policy, we may share your Personal Information with third party partners and service providers, such as website hosting partners and other parties who assist us in operating our website, conducting our business, or otherwise

providing the services you request; these service providers and partners agree to keep all such information confidential. We may share certain information, including your Personal Information, with our parent company, subsidiaries, joint ventures, or other companies under common control (“Affiliates”). Any Personal Information shared with our Affiliates will be used in a manner consistent with this policy. We may also release your information when we believe in good faith that release is appropriate to comply with the law, enforce our site policies, or protect ours or others’ rights, property, or safety. Finally, we may share your Personal Information with third parties for any other purpose with your consent.

However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

THIRD-PARTY LINKS

We do not include or offer third party products or services on our website. However, to the extent our website may link to a third party website, and if you should use such links, we are not responsible for the content of any third party website, nor for the data collection or handling practices of such third party.

GOOGLE

Google’s advertising requirements can be summed up by Google’s Advertising Principles. They are put in place to provide a positive experience for users. – See more at:

<https://support.google.com/adwordspolicy/answer/1316548?hl=en>

We have not enabled Google AdSense on our site but we may do so in the future.

CALIFORNIA ONLINE PRIVACY PROTECTION ACT

CalOPPA is the first state law in the nation to require commercial websites and online services to post a privacy policy. The law's reach stretches well beyond California to require a person or company in the United States (and conceivably the world) that operates websites collecting personally identifiable information from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals with whom it is being shared, and to comply with this policy. – See more at:

<http://consumercal.org/california-online-privacy-protection-act-caloppa/#sthash.0FdRbT51.dpuf>

To comply with CalOPPA, we agree to the following:

- Users can visit our site anonymously;
- Once this privacy policy is created, we will add a link to it on our home page, or as a minimum on the first significant page after entering our website;
- Our Privacy Policy link includes the word 'Privacy', and can be easily be found on the page specified above;
- Users will be notified of any privacy policy changes via the privacy policy website page; and
- Users are able to change their personal information by emailing us.

How does our site handle do not track signals?

We honor do not track signals and do not track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third party behavioral tracking?

It's also important to note that we do not allow third party behavioral tracking.

COPPA (CHILDREN ONLINE PRIVACY PROTECTION ACT)

When it comes to the collection of personal information from children under 13, the Children's Online Privacy Protection Act (COPPA) puts parents in control. The Federal Trade Commission, the nation's consumer protection agency, enforces the COPPA Rule, which spells out what operators of websites and online services must do to protect children's privacy and safety online.

We do not specifically market to children under 13.

CCPA (CALIFORNIA CONSUMER PRIVACY ACT)

If you are a California resident, please refer to Under Wraps's [Privacy Notice for California Residents](#).

We do not offer financial incentives based on your providing us with your personal information. We may require certain Personal Information from you to provide you with, or to enroll you in, requested services or programs, including in partnership with third parties. You have the right at any time to opt out of these services or programs; however, if you opt out, you may not be able to participate in, or receive the benefits of, such services or programs.

FAIR INFORMATION PRACTICES

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will notify users of our website within (7) business days should a data breach occur.

We also agree to the individual redress principle, which requires that individuals have a right to pursue legally enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or a government agency to investigate and/or prosecute non-compliance by data processors.

CAN SPAM ACT

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, promotions, marketing information, business information, respond to inquiries, and/or other requests or questions;
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred; and
- Share your information with our third party providers to market our business to you.

To be in accordance with CANSPAM we agree to:

- Refrain from using false, or misleading subjects or email addresses;
- Identify the message as an advertisement in some reasonable way;
- Include the physical address of our business or site headquarters;
- Monitor third party email marketing services for compliance, if one is used;
- Honor opt-out/unsubscribe requests quickly; and
- Allow users to unsubscribe by using the link at the bottom of each email by following the requisite instructions. Once a user unsubscribes, they will be promptly removed from ALL correspondence.

CONTACTING US

If there are any questions regarding this privacy policy, you may contact us using the following information:

Under Wraps

231 E BROAD STREET
WESTFIELD, NJ 07090

United States

PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective Date: 1/1/2020

Last Reviewed on: 9/14/2022

This **Privacy Notice for California Residents** supplements the information contained in Under Wraps's [General Privacy Notice](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). **If you do not reside in the State of California, this notice does not apply to you.** We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended from time to time (the "CCPA") and any terms defined in the CCPA have the same meaning when used in this **Privacy Notice for California Residents.**

Information We Collect

The information we collect is as outlined in our [General Privacy Notice](#). It is information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal information”). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability act of 1996 (“HIPAA”) and the California Confidentiality of Medical Information Act (“CMIA”) or clinical trial data.

In particular, we have collected the following categories of Personal information from our consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES

<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.</p>	<p>YES</p>
<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>YES</p>
<p>D. Commercial information.</p>	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>YES</p>

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO

K. Inferences drawn from other personal information. Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. NO

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website, or from the information you provide at our studios.
- Directly and indirectly from activity on our website (<https://underwrapspersonaltraining.com/>). For example, from submissions through our website portal or website usage details collected automatically.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to prepare a price quote, to ask a question, or to set up a session, we will use that information to respond to your inquiry.
- If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.

- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

We have disclosed information in Categories A-K with our business partner who is our member management system and included in Service providers below.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Our parent.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

ACCESS TO SPECIFIC INFORMATION AND DATA PORTABILITY RIGHTS

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.

- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

DELETION REQUEST RIGHTS

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

EXERCISING ACCESS, DATA PORTABILITY, AND DELETION RIGHTS

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Completing an online request here:
 - [Your Privacy Choices Request Form](#)
- Calling us at:
 - (908) 297-0264

Only you or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

RESPONSE TIMING AND FORMAT

We endeavor to respond to a verifiable consumer request within (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we

determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Financial Incentives

We do not offer financial incentives based on your providing us with your personal information. We may require certain Personal Information from you to provide you with, or to enroll you in, requested services or programs, including in partnership with third parties. You have the right at any time to opt out of these services or programs; however, if you opt out, you may not be able to participate in, or receive the benefits of, such services or programs.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information,

your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (908) 297-0264

Website: <https://underwrapspersonaltraining.com/>

Email: underwrapspersonaltraining@gmail.com

Postal Address:

Under Wraps

231 E BROAD STREET

WESTFIELD, NJ 07090

Attention: Privacy