PRIVACY POLICY

Effective: May 25th, 2018. (previous version here)

We care about your privacy! Our goal is to offer you best-in-class technology services while respecting your privacy and protecting your personal information. Thank you for this opportunity to earn your trust.

Introduction

This "Privacy Policy" is intended to describe our general privacy practices and covers all users of our Services (described below).

As you explore our Platform, we may provide additional details "just-in-time" before you sign up or enable features. We encourage you to read the tips whenever you see them. Tips provide specific information about how features work and how your information may be used to provide a particular Service.

Definitions

In this Privacy Policy, click the "eyeball" 👁 icon to see frequently asked questions about a topic. These FAQ's are to help explain things, but they are not part of our Privacy Policy.

"We," "us," "our," and "RTRT" means Dilltree Inc d/b/a RTRT.me, a USA corporation located in the State of Florida.

"User" or "users" means anyone who visits one of our mobile apps or web sites. Users might be event participants, spectators, administrators, volunteers or just a passer-by. A user may be an anonymous visitor, or someone who has registered to use the Platform and Services, created an "Account" and signed in.

"You", or "your", means you, as a user of our Platform. You may be an anonymous visitor or a registered user with an Account.

"Event Administrators" means the special users in our Platform who have access to manage the information for an event. If you are an Event Administrator, this Privacy Policy applies to you as well. Additionally, Event Administrators using our Platform are considered "controllers" of information and are required to abide by our Terms of Use and this Privacy Policy with respect to the personal information that they manage. Event Administrators must obtain consent to use your information. ◉

RTRT.me is a software Platform providing real-time race tracking and other race-event related services for running and multi-sport events (the "Services"). This Privacy Policy applies to RTRT.me, the RTRT.me mobile app, any white-labeled or re-branded mobile apps by RTRT, and other RTRT.me related software, sites, apps, communications, API's and systems, including off-site services such as our embeddable iframe HTML widgets, but excluding services that state that they are offered under a different privacy policy (the "Platform"). Also, this Privacy Policy does not apply to 3rd party content that has been embedded in our apps as "Info

Sections" that open in the in-app browser of our mobile app, or as a new tab in of a web browser.

Data We Store and How We Collect It 🔗

Data in our Platform includes:

INFO PROVIDED BY EVENT ADMINISTRATORS

Participant Registration Data: If you are a participant who registered for an event for which we are providing Services, your participant record ("profile") may be uploaded to our Platform by the Event Administrator to produce and publish the event results. Publicly accessible fields may include your name, gender, city, country, bib number, type of event, age group, team name, and name of your charity (if associated). As a participant, you may "Claim" your profile to adjust your profile settings. Changes you can make to your claimed profile include uploading a public

profile picture, creating a public bio, and changing your profile visibility. 👁

Event Administrators may store other fields for internal use as needed to manage the event data or to support certain features. Sensitive participant information is stored securely and is not available to the public. 👁

IMPORTANT: If you believe that the event administrators did not properly obtain authorization to use your information or to publish your profile in our live results platform, or if you wish to hide, unpublish or delete your information now, please contact the event, or contact us directly at privacy@rtrt.me. You may also manage your profile's visibility on your own by using our app or web results. Search for your name, click "Claim", and set your profile visibility from your Account page.

Participant Timing Data: One key feature of our Platform is to track participants in real-time and to providing live timing, current

and estimated locations & results. If you are a participant who registered for an event found in RTRT, your location can be tracked in real-time while at the event. We may publish your specific location on a map, provide estimates of your arrival times at various locations, show your pace, the history of your timing, and send notifications to users who have opted in to follow you. 👁

INFO YOU PROVIDE TO US

Your Account Data: Many features can be used anonymously, but when enabling some features, we may ask you to create an Account in our Platform. If you choose to create an account and sign in, we may gather and store additional information about you in order to perform the services requested.

You can create an account by providing a name, email address and password. In some cases, you may choose to sign in using a social network such as Facebook or Twitter. After you create an account, other information may be gathered depending on which

features you wish to use. For example, you may set a nickname, or a public profile picture by uploading a photo via our app.

If you are registering as a participant of an event, or signing up as a volunteer, we will need to collect more information such as your contact phone number and mailing address. These are just a few examples. In general, our Platform gives Event Administrators the ability to build custom questionnaires as needed in order to provide a wide variety of Services. Any information that you provide to the event or to us via your account may be stored in your RTRT Account.

Your Account will also be associated with certain "Preferences" that you select while using the app. For example, you may set a preference to use the app as a participant or spectator, set your language, claim your participant profile, and manage other settings. Your Preferences are securely and privately associated with your Account. When you sign in from a new device, your Preferences are synchronized to that device and will be cleared when you sign out. You can view and manage all of your Preferences from your Account page.

Connected Devices: For some events, you may associate a connected device with your account, such as a smart phone, smart watch, or other wearable device. When enabled, we may collect certain information available from the device or from your account associated with the device provider. Information gathered from devices may include your unique device identifier, account id, location, step count, heart rate, cadence, and other information about you or your activity.

> **NOTE:** We do not gather connected device information and associate it with your account unless you explicitly opt-in. We will always ask for your permission before enabling your device specific features such as push notifications, location services or biometrics.

Additional Data: You may choose to provide more information to us in order to enable a feature, share content, get support, or to offer feedback to help us improve the Platform. A few examples include using the contact form on our website, sending an email asking for help, sending a cheer, submitting feedback via our app, posting messages or other content to appear in our app feeds or in our forum. From time to time, you may participate in a survey, contest, or promotion. In these cases, we collect and store the information you submit such as your name, contact information, message, and any other info you provide.

INFO FROM YOUR USE OF OUR SERVICES

Anonymous Usage Data: As you use our Services, we may gather information about the kind of device or computer browser you are using, as well as from your interactions while navigating. This kind of information is collected anonymously, is non-personal, i.e., it does not include anything to identify you specifically. Anonymous Usage Data may include your IP

address, approximate location derived from your IP address (such as city & state), page views, clicks, visit duration, date & time, browser type, device operating system, network type, and language settings.

Cookies & Local Storage: RTRT makes very little use of cookies but they are necessary in certain limited circumstances. Cookies are used to support social media plug-in features, specifically, to allow sign-in via social networks, such as Facebook, and to support direct sharing to such social platforms from our Services. We do not use advertisement cookies, cross-domain tracking, or pixel technologies.

We use local storage in our Services to cache settings and to maintain the state of your login. Cookies may be used as a fallback for caching in some browsers if local storage is not available.

You may disable cookies and local storage in your browser or

device settings, however, this may make some of our Services unavailable or affect performance.

Event Administrator Activity: If you are an Event Administrator using our admin console or tools, we log and keep a history of your actions taken.

How We Use Data 🔗

No matter what Service is being provided, your personal information is only used to provide the Services and for the purposes mentioned in this Privacy Policy. We do not sell your personal information to 3rd parties.

Data we collect is used to:

PROVIDE AND SUPPORT THE SERVICES

We use the information we collect to deliver Services to you and to our Event Administrators. How we use your personal data depends on which Services are being performed. Our Platform is primarily used by running and multi-sport events to publish participant tracking and timing information in real-time. We use information to enhance the event experience by offering interactive features such as notifications, social sharing, sending cheers, finisher badges, enabling user-to-user communications, and more. For Event Administrators, information is used and controlled using our advanced tools designed to help produce events with less effort, better workflow, fewer errors, and improved customer service.

We also access and use your information when needed to provide support to you or the Event Administrators using our Services.

COMMUNICATE WITH YOU

Support & Announcements: We use your information when needed to send you Service notifications and respond to you when you contact us. We may email you with information for the purpose of account maintenance, such as password reset, account information or policy change updates, and to notify you about new features available in our system. You can manage your communications Preferences in your Account page or by contacting us directly at privacy@rtrt.me.

Mobile App Push Notifications: When you install one of our mobile apps, you will be prompted by your device's built in permission system to allow or disallow "Push Notifications". If you say yes to allow notifications, you will be signed up to receive push messages sent by us or by the app's Event Administrators. Additionally, you will automatically be subscribed to receive "Event Messages" when you select an event and "Participant Notifications" when you add participants to tracking. 👁

Email Alerts & SMS Text Messages: Our Platform allows users to sign up for real-time split point notifications delivered by email or SMS text. If you sign up for one of these Services, we will send you a confirmation email or text with instructions on how to stop or unsubscribe.

Additionally, our Platform allows Event Administrators to send important event communications via SMS and email to you via our Platform. 👁

IMPROVE AND DEVELOP FEATURES

The information we collect may be used to improve or develop new Services. For example, we may use the information to troubleshoot and debug an issue, to perform analysis and testing, conduct research, and develop new features and Services. Anonymous Usage Data that we collect also helps us to improve our Services.

When you enable "Share My Location" and allow us to collect precise location information, we use that information to provide and improve features of the Services. For example, we may provide more accurate participant tracking, associate a shared photo with a particular location on course, or to generate a heatmap of app activity at the event.

PERSONALIZE THE SERVICES

Your user Preferences give you personalized control over your experience and also act as filters to improve the relevance of event messaging, content, and ad spots appearing in the application. For example, Event Administrators may send different messages to spectators than to participants, or provide content in different languages.

If you are signed in, you Preferences are securely and privately associated with your Account. When you sign into a new device, your Preferences are synchronized to that device and are cleared

from the device when you sign out.

NOTE: Event Administrators cannot see your Preferences. Preferences do not include anything defined as "special categories of data" as defined under GDPR.

PROMOTE SAFETY AND SECURITY

We may use the information we collect to help promote safety and security on and off our Platform, such as for investigating suspicious activity, violations of this Privacy Policy, our Terms of Use or the terms and requirements of the event, or for protecting our or others' rights or property.

How Data Is Shared 🔗

Data may be shared in the following ways:

YOUR PROFILE

If you are a participant, the non-sensitive, public information in your profile is visible to all users of our Services. See Data We Store and How We Collect It. Event Administrators use our Service to share and publish event results in real-time with your permission.

CONTENT SHARING FEATURES

As a user of our Platform, you may opt-in to share information publicly or privately with other users of our Services. Generally, when you share, interact, upload, and communicate using our Services, we will make clear who the audience will be. Sometimes, we will offer you a choice on who the audience is for what you share. For example, when enabling our app "Cheer" feature, you may choose whether the cheers you send stay

private, between you and the participant, or appear publicly in a global cheer feed for the event.

> **IMPORTANT:** You should consider very carefully what you share, and who you share it with. In general, if you share something to the public, it becomes available for anyone to see. Also, please consider that if you share something publicly to everyone or privately with another user in our system, the receiver(s) can, for certain data, choose to reshare it with others and even share it outside of our Services. For example, when you send a message or submit a cheer to a specific friend, your friend can download, screenshot, or reshare that content to others inside or outside of our apps. Once information is made public, it can be seen, accessed, reshared or downloaded through third-party services such as search engines, APIs, offline media such as TV, and by apps, websites and other services that either officially integrate with our Services, or unofficially take information by crawling.

FOR REPORTING AND OTHER USES OF ANONYMIZED DATA

There are a variety of circumstances where RTRT will generate reports or engage in other activities with data from which your personal information has been removed. Personal information is information you provide us which personally identifies you, such as your name, physical address, email address, phone number, password, financial information used for payments through the Service, age/birthday, phone number, social media identifiers, email or other personally identifying information. RTRT does not intentionally collect any personal information about your race, ethnicity, or political affiliations.

Anonymized data (also known as de-identified information or aggregated non-personal data) is different from personal information. Anonymized data is information about our users, their computers or devices and/or use of our Services that are collected into groups so that it no longer reflects or references an individually identifiable user. This information may include, without limitation, information about use of our Services, web pages viewed or used, Service content accessed or used, IP addresses and device identifiers, information about hardware or

software used to access the Service, user location information, page views, app usage, customization settings relating to the Service, and other types of information we collect that cannot reasonably be used to identify you personally. RTRT may collect and use aggregated non-personal information to generate reports that we share with others, including Event Administrators, to gain insights on how many visitors used each of the Services, at what time, and from where in general, to improve the Service or for any other reason, at its sole discretion.

LEGAL REQUESTS OR TO PREVENT HARM

We may access, preserve and share information with regulators, law enforcement or others in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions inside or outside of the United States where we have a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized

standards. Information we receive about you, including financial transaction data related to purchases made on or through our Services, can be accessed, processed and retained for an extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm. We may also retain information from accounts disabled for violations of our terms for at least a year to prevent repeat abuse or other term violations.

Your Right to Control 🔗

We offer the following options to control your data:

Hide Participant Profile Data: Participants can Claim their profiles and make their participant profile invisible to others. If you do this, you can still see use the tracking and see the results of your participation, but others will not be able to find your

information. Claiming a profile must be done for each event that you participate in.

Delete Data: You can ask us to erase or delete all or some of your personal data if it is no longer necessary to provide Services to you. You may also destroy your account by selecting 'Delete Account' from the Account page.

> **NOTE:** If you are a participant, deleting your Account may not remove your participant profile since your Account is not always associated with your participant profile. Additionally, since deletion of participant profile would alter the standings for other participants, profiles must be de-identified (made anonymous) or hidden rather than deleted. To exclude your participant profile from our system after deleting your account, please contact the event, or contact us directly at privacy@rtrt.me.

Change or Correct Data: You can edit some of your personal data through your Account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.

Object to, Limit or Restrict Use of Data: You can ask us to stop using all or some of your personal data (e.g., if we have no legal right or obligation to keep using it) or to limit our use of it (e.g., if your personal data is inaccurate or unlawfully held).

Right to Access and/or Take Your Data: You can ask us for a copy of your personal data and we will provide it in a machine readable form.

Data Retention 🔗

We store your data until it is no longer necessary to provide the Services.

How long we store data must be determined on a case-by-case basis. The duration of retention depends on the nature of the data, why it is collected and processed, and relevant legal, contractual, or operational retention needs. As an example, something like a social network "authentication token" is only needed during the event, and is, therefore, deleted after the event. However, participant profiles and timing data are kept after the event in order to maintain accurate historical event results.

If you choose to delete your Account as explained in Your Right to Control your online personal information becomes inaccessible immediately. However, it may take up to 90 days to delete all of your information from our offline backup systems. If reasonably necessary to comply with our legal obligations, we

may preserve data for legal reasons or to prevent harm, including in the manner described in the How Data Is Shared section.

Data Security & International Data Transfers 🔗

Personal data stored by RTRT on the Platform is handled carefully and in accordance with all applicable privacy law requirements. For example:

Data Security: We implement many security safeguards designed to protect your data, such as firewalls to block access, HTTPS and TLS (Transport Layer Security) to transfer, and storage encryption to protect data at rest. While no method of transmitting or storing data is completely secure, we continually monitor our systems and use all commercially reasonable methods to keep personal information securely in our files and systems. With current technology, however, we cannot guarantee the security of your data from all possible attacks or intrusions

on our servers or guarantee the security of your data as it travels over the Internet. Thus, you hereby release RTRT from liability for any such possible attacks or intrusions that might compromise the security of your personal data.

NOTE: If you have a security-related concern please contact us immediately at help@rtrt.me.

Data Transfers: We operate internationally and transfer information to our systems in the United States or other countries for the purposes described in this Privacy Policy.

Grounds For Personal Data Processing 🔗

The following are RTRT's grounds for processing personal data:

To pursue legitimate interests: Based on the feedback we have received while providing our Services to many millions of participants around the globe, we feel we are providing a highly valuable and desirable service to the members of the running and multi-sport event community and that our Services have a very minimal privacy impact. Participants want (and expect) the event to publish results, and especially to provide real-time tracking. Our Services are now customary and standard for the industry. Participants willingly provide their information when registering for the event. On race day, they wear the tracking device provided and proceed through the course over the timing checkpoints. If you are a participant, your expectation is that the timing device is working to record and publish your progress to the friends, family, and fellow participants who care about how you are doing in the race.

To deliver services you have contracted for: For almost all events, your agreement to participate in the event includes

certain services the event has promised to provide you such as live tracking and results. We provide many of the services on behalf of the event and, therefore, must process personal data in order to deliver the services you are supposed to receive under your agreement with the event provider.

Because you have asked us to: As a user of our Platform, you give us consent to process your information and provide you with Services when you create an Account and accept our Terms of Use and Privacy Policy.

> **NOTE:** Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object. See Your Right to Control. If you have any questions about the lawful bases upon which we collect and use your personal data, please contact our Data Protection Officer at dpo@rtrt.me.

Children 🔗

Our Services are not intended for children under 16 years of age.

Our Services are not intended for children under 16 years of age. No one under the age of 16 should ever be included in the RTRT results Platform or allowed to use our Services without explicit parental consent. Persons under the age of 16, or any higher minimum age in the jurisdiction where that person resides, are not permitted to create Accounts unless their parent has consented in accordance with applicable law. If we learn that we have collected the personal information of a child under the relevant minimum age without parental consent, we will immediately delete the information as soon as possible. If you believe we might have any information from or about a child under 16, please contact us at privacy@rtrt.me.

Legal Supervisory Authority

We have designated the United Kingdom as the legal supervisory authority (LSA) for any privacy law issues related to the GDPR or other privacy laws in the European Union.

Changes 🔗

We may change this Privacy Policy from time to time.

The most recent version of the Privacy Policy is reflected by the version date located at the top of this Privacy Policy. All updates and amendments are effective immediately upon notice, which we may give by any means, including, but not limited to, posting a revised version of this Privacy Policy at https://rtrt.me/legal/privacy or displaying a notice in our apps the next time you use Account. We encourage you to review this Privacy Policy often to stay informed of changes that may affect you, as your continued use of our Services signifies your

continuing consent to be bound by this Privacy Policy. Our electronically or otherwise properly stored copies of this Privacy Policy are each deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Privacy Policy which were in effect on each respective date you used our Services.

Contact 🔗

Here is how you can contact us:

If you have a privacy concern, or have questions or suggestions about how we can improve this policy, please contact us at privacy@rtrt.me or by using our contact form.

If contacting us does not resolve your complaint, you have more options. Residents in the European Union (EU), European Economic Area (EEA), and Switzerland may also have the right to contact our Data Protection Officer at dpo@rtrt.me.

Privacy Policy