### **GENERAL**

Gnarly Routes, Inc. respects the privacy of persons that use our Website, including all mobile applications related or connected therewith (collectively the "Website"). Gnarly Routes., Inc. is committed to ensuring that your privacy is protected, and this policy is designed to inform you, as a user of the Website, about the types of information that Gnarly Routes, Inc. may gather about or collect from you in connection with your use of the Website. The policy also explains the conditions under which Gnarly Routes, Inc. uses and discloses that information and your rights in relation to that information. Each time you use the Website, however, the current version of this Privacy Policy will apply. Accordingly, each time you use the Website, you should check the day of this Privacy Policy (which appears at the beginning of this document) and review any changes since the last time you used the Website.

Gnarly Routes, Inc. is based in the United states of America, and it, as well as this Website, is subject to U.S. State and Federal Law. If you are accessing Gnarly Routes's Website from other jurisdictions, please be advised that you are transferring your personal information to us in the United States, and by using our Website, you consent to that transfer and use of your personal information in accordance with this Privacy Policy. You also agree to be bound by the laws of the United States and the applicable states concerning your use of the Website and your agreements with us. If your use of this Website would be unlawful in your jurisdiction, please do not use the Website. BY USING OR ACCESSING THE WEBSITE, YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY.

## WHAT WE COLLECT

We collect Non-Personally-Identifying Information that Web browsers, depending on their settings, may make available such as Internet protocol (IP) address, operating system, browser type and the locations of the websites the user views right before arriving at, while navigating and immediately after leaving the Website, and this data might allow us to determine your Internet service provider and the geographic location of connectivity, as well as other statistical data. This information allows us to identify patterns and trends in usage, and as such allows us to better understand the design of our Website to improve your experiences, both in terms of content and ease of use. In addition to Non-Personally-Identifying Information, we also collect a range of Personally-Identifying Information which is provided by you when registering for our

services and communicating with us. This information includes, but is not necessarily limited to, your name and job title, contact information, demographic information, post code, preferences and interests, and other information relevant to customer surveys and/or offers. We also may request information about your interests and activities, your gender, age, date of birth, home town, and other relevant information as determined by us from time to time. You are under no obligation to provide us with Personally-Identifying Information of any kind, with the caveat that if you refuse to do so, you may be prevented from using certain features of our Website. BY REGISTERING WITH OR USING OUR WEBSITE, YOU CONSENT TO THE USE AND DISCLOSURE OF YOUR PERSONALLY-IDENTIFYING INFORMATION AS DESCRIBED HEREIN. DISCLOSURES Gnarly Routes, Inc. will disclose Personally-Identifying Information under the following circumstances: Gnarly Routes, Inc. uses the Personally-Identifying Information that is maintained about you and other information obtained from your current and past activities on the Website to deliver the products and services that you have requested, to manage your account and provide you with customer support, to communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you, to develop and display content and advertising tailored to your interest on the Website and other sites, to resolve disputes and troubleshoot problems, to measure consumer interests in our services, to inform you of updates, to customize your experience, to detect and protect us against error, fraud and other criminal activity, and to enforce our terms of use. We may use financial information or payment method to process a payment for any purchases made on this Website, enroll you in our programs in which you have elected to participate, and to protect against or identify possible fraudulent transactions and otherwise as needed to manage our business.

We may also disclose Personally-Identifying Information when we believe disclosure is appropriate in connection with efforts to investigate, prevent or take other action regarding illegal activity, suspected fraud, or other wrongdoing; to protect and defend the rights, property or safety of Gnarly Routes, Inc., our users, our employees or others, to comply with applicable law or cooperate with law enforcement, including responses to subpoenas or investigative demands, to establish or exercise our legal rights, and to defend against legal claims or otherwise as required by law. Gnarly Routes, Inc. also may share your Personally-Identifying Information with our authorized service providers

that perform certain services on our behalf, such as customer service, marketing assistance, business and sales analysis, website functionality support, surveys and other features offered through the Website. We may also share your name, contact information and credit card information with our authorized service providers who process credit card payments.

## **WEB COOKIES**

A "Web Cookie" is a string of information which assigns you a unique identification that a website stores on a user's computer, and that user's browser provides to the Website each time the user submits a query to the Website. Cookies allow our applications to respond to you as an individual and allows us to tailor our operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use Cookies to identify which pages are being used which allows us to analyze data about our Web page traffic and improve our Website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

SHOULD YOU NOT WISH TO HAVE WEB COOKIES PLACED ON YOUR COMPUTER, YOU SHOULD SET YOUR BROWSER TO REFUSE WEB COOKIES BEFORE ACCESSING THE WEBSITE, WITH THE UNDERSTANDING THAT CERTAIN FEATURES OF THE WEBSITE MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF WEB COOKIES. WEBSITE USERS WHO REFUSE COOKIES ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.

# SECURITY

We take the security of your Personally-Identifying Information seriously and use reasonable electronic personnel and physical measures to protect it from loss, theft, alteration or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will view your information. We are not responsible for third-party circumvention of any privacy settings or security measures. Our Website may contain links to other websites of interest. Should you choose to use a link, you understand you are leaving our site and you acknowledge that we cannot be responsible for the protection and privacy of any information which you provide while visiting any other site.

# **CALIFORNIA PRIVACY RIGHTS**

California Civil Code Section 1798. 83, also known as the "Shine The Light" law, permits any user who is a California resident to request and obtain from Gnarly Routes, Inc., once a year and free of charge, information about the Personally-Identifying Information (if any) we disclose to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of the PersonallyIdentifying Information that was shared and the names and addresses of all third parties with which we shared Personally-Identifying Information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to our Privacy Officer as listed below.

# **DATA PROTECTION ACT**

You may request details of Personally-Identifying Information which Gnarly Routes, Inc. holds about you under the Data Protection Act. A small fee would be payable. If you would like a copy of the information held by Gnarly Routes, Inc. on you, please contact our Privacy Officer as listed below.

If you believe any information we are holding on you is incorrect or incomplete, please contact our Privacy Officer. We will promptly correct any information found to be incorrect.

## **TRADEMARKS**

The website including but not limited to the graphics, logos, page headers, button icons, scripts, photos, videos and names constitute trade dress of Gnarly Routes, Inc. The trademarks, service marks, and trade dress of Gnarly Routes, Inc. may not be used or reproduced without prior written approval from Gnarly Routes, Inc. and may not be used in connection with any product or service that is not affiliated with Gnarly Routes, Inc. in any manner that is likely to cause confusion among customers, or in any manner that dilutes the rights of Gnarly Routes, Inc., or in any manner that disparages or discredits Gnarly Routes, Inc. Other trademarks that appear on the Gnarly Routes, Inc. website and user interfaces are the property of their respective owners, who may or may not be affiliated with, connected to, or sponsored by Gnarly Routes, Inc. Any images of persons or personalities contained on the Gnarly Routes, Inc. website and user interfaces are not an indication or endorsement of Gnarly Routes, Inc. or any particular product or our service unless otherwise indicated

### CONTACT

If you have questions regarding our Privacy Policy, please contact our Privacy Officer at: info@gnarlyroutes.com