



Privacy Policy

Who Are We?

This data protection information applies to data processing by:

Stride Labs L.L.C.-F.Z.

The Meydan Hotel, Grandstand, 6th floor, Meydan Road, Nad Al Sheba, Dubai,
U.A.E. P.O. Box No: 9305

License No: 2416204.01

Hereinafter referred to as "We" through the Apple or Android mobile application Stride (hereinafter referred to as "Stride" or "the Application").

What Data Do We Process?

As the data controller, we collect and process the following data about you:

- Information you provide: Personal data you provide when filling out forms on the Application, including, but not limited to, your username, password, name, email address, phone number, country, date of birth, a photo, links to the person you sponsor, challenges you undertake, advertisements you watch (personal interests), promotional codes chosen and used. With your explicit consent, we may also collect data related to your physical state (weight, height) and/or health.
- Information collected via your smartphone: Daily step count (collected via the pedometer) and location data (collected via GPS); contact list.
- Information transmitted by third-party partners: Email address, name, first name, and profile picture from your Google account if you connect to Stride via this account; use of a promotional code with the partner.
- Information necessary for personalizing advertisements on the Application: Your phone's advertising ID, navigation on the Application (including clicks), your date of birth, your country.

- Our correspondence: If you contact us, we generally keep a record of that correspondence.
- Information related to surveys and studies: We may ask you to participate in surveys, studies, questionnaires from Stride or third-party partners. We collect data provided in the completed survey for our own purposes or to pass on to our third-party partners.
- Information we may collect about you in the context of verifying your use of the Application: Provisional ranking of Stride users, suspicious behaviors, cheating, etc. For more information on prohibited behaviors when using Stride, please consult our Terms of Use.
- Application and use of communications: Details of your visits to the Application and information collected through trackers and other tracking technologies, including, but not limited to, your IP address and domain name, browser version and operating system, browser language, access time, traffic data, location data, movements on the Application, addresses of third-party websites for reference, and other communication data. We may also collect information about the pages you view on the Application and other actions you take during your visit. Additionally, we may use these technologies to determine if you have opened an email or clicked on a link contained in an email.

Why Do We Process These Data?

We only collect data we actually need, and only from the moment this need arises. Data processed for a specific purpose cannot be reused for other purposes unless this use is also legally justified.

We use these data for the following purposes:

- Registration as a Stride user and use of the Application: We collect your personal data to provide you with a Stride account. Then, when you use the Application, we collect and process your data to offer our services: evaluating your actions (physical movement, viewing advertising content, sponsorship, Stride challenges...) to convert them into points and award rewards.
- Personalization of the advertisement to watch on the Application to collect points: If you authorize us, we collect your personal data to personalize this content and show you advertisements that match your expectations and needs.
- Sharing your data with third-party partners for advertising purposes: If you authorize us, we share your personal data with our third-party partners whose advertising is available on the Application. This allows them to contact you by email to offer you their products and services. Be careful: if you click on the advertisement, you will be taken to the third-party partner's website, and your personal data may be collected via this site, outside of Stride's

control. Please refer to the partner's privacy policy for more information on how they process your data.

- Subscription to our newsletter/advertising actions by email or any request from you that we contact you (contact form, events, other): If you have expressly consented or if you have already created a Stride account, we may use your email address to send you news and advertising actions from Stride. Unsubscribing is possible at any time by clicking on the link provided in the email.
- Improvement of the Application and our services: We collect your data to gather statistics on the use and effectiveness of the Application using various technologies and to personalize your experience when you are on the Application, as well as to adapt our interactions with you.
- Detection of suspicious behaviors and cheating: We may use your personal data to verify and monitor your use of the Application. For example, we may cross-reference data to identify false data, fake accounts, or the existence of multiple accounts for the same user, as well as the sources of certain data to verify how points were collected.
- Reorganization of our business and/or structure: In case we are involved in negotiations for the sale of our business or part of it to a third party; are sold to a third party; or undergo a reorganization, we may need to transfer some or all of your personal information to the concerned third party (or its advisors) as part of any due diligence process for analyzing any proposed sale or reorganization. We may also need to transfer your personal information to the reorganized entity or to that third party after the sale or reorganization for them to use for the same purposes set out in this policy.
- Compliance with our legal or regulatory obligations: We may process your personal information to comply with our regulatory requirements or to engage with regulators as applicable, which may include disclosing your personal information to third parties, court services, and/or regulators or law enforcement agencies in connection with inquiries, proceedings, or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will directly make such a request for information or notify you before responding, unless to do so would prejudice the prevention or detection of a crime.

With Whom Do We Share These Data?

We work with the following subcontractors who assist us in achieving the purposes mentioned in section 2 above:

- GOOGLE: for hosting and storing your data
- MOENGAGE: to create a database of our users
- ZENDESK: to provide support services to our users

We also work with providers who help us measure the performance of our services and the Application and improve them, for example, Mixpanel, Adjust.

We contractually require these service providers to maintain the confidentiality of your personal data and not to use it for purposes other than those necessary for the execution of our contract with them.

We also share your personal data with:

- our third-party partners for advertising purposes via the Application. These partners use your data to know the origin of your purchase from them (in this case, a promotional code obtained through Stride). We ensure they do not process your data for other purposes.
- advertising intermediaries, for example, Facebook and TikTok. These intermediaries share your data with their own partners, in accordance with their privacy policies.
- other third-party recipients such as our banks, our advisors, legal and regulatory authorities when required by law, judicial or administrative authorities in case of a dispute between you and us.

We store your personal data within the European Economic Area (EEA). However, for the purposes outlined in this policy, it is sometimes necessary to provide some of your data to subcontractors and recipients located outside the European Economic Area (EEA). When we do so, we will ensure that these transfers guarantee an appropriate level of data protection.

Some countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws, and therefore no additional safeguards are required to export personal data to these jurisdictions.

In countries that have not received these approvals (the list of which can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm), we use EU-approved "standard contractual clauses" to ensure the application of data protection safeguards equivalent to those required in the EEA.

Please contact us if you would like to obtain a copy of the safeguards we apply regarding the export of your personal data.

What Are Your Rights?

You have the right to:

- request information about the personal data we process according to Article 15 of the GDPR. You can specifically request information about the purposes of the processing, the category of personal data, the categories of recipients to whom your data has been or will be disclosed, the planned storage duration, the existence of a right to correction, deletion, limitation of processing or objection, the existence of a right of appeal, the origin of your data if they were not collected from us, as well as the existence of automated decision-making including profiling and, if applicable, meaningful information about the details of this decision-making;
- demand the immediate correction or completion of incorrect personal data stored by us according to Art. 16 GDPR;
- demand the deletion of your personal data stored by us according to Art. 17 GDPR, unless the processing is necessary for exercising the right of freedom of expression and information, for compliance with a legal obligation, for reasons of public interest, or for the establishment, exercise, or defense of legal claims;
- demand the restriction of the processing of your personal data according to Art. 18 GDPR, as far as the accuracy of the data is disputed by you, the processing is unlawful, but you refuse their deletion and we no longer need the data, but you need them for the assertion, exercise or defense of legal claims or you have objected to the processing according to Art. 21 GDPR;
- receive your personal data that you have provided to us in a structured, commonly used and machine-readable format or to request the transfer to another controller according to Art. 20 GDPR;
- revoke your consent given to us at any time according to Art. 7 para. 3 GDPR. As a result, we are no longer allowed to continue the data processing based on this consent for the future;
- complain to a supervisory authority according to Art. 77 GDPR. You can find the list of contact details of the European competent authorities here: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm. Generally, you can contact the supervisory authority of your usual place of residence, your place of work, or our company headquarters.

You may have additional rights provided in the national legislation of your place of residence.

If your personal data is processed based on legitimate interests, you have the right, according to Article 21 GDPR, to object to the processing of your personal data, provided that there are reasons arising from your particular situation or if the objection is directed against direct advertising. In the case of direct advertising, you can exercise your right by clicking on the link provided for this purpose in the communications we send you, or by sending an email to hello@stride.social.

How Is the Security of Your Data Ensured?

Stride implements appropriate technical and organizational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access, and to preserve the confidentiality of the data collected.

Stride cannot guarantee the absolute security of personal data. In the event that Stride becomes aware of a security breach, namely a loss of availability, integrity, or confidentiality of data, accidentally or unlawfully, Stride commits to notify the competent data protection authority and, if necessary, to inform you.

You are responsible for maintaining the confidentiality of your Stride username and password. We recommend that you never share this password.

How Long Are Your Data Stored?

Our data retention periods are based on business needs and legal requirements. We retain personal data for as long as necessary for the processing purposes for which the information was collected, and any other permitted related purpose.

We then securely archive them to meet our legal and regulatory obligations (for example, our accounting obligations, or to defend our interests in case of litigation with a user). When data is archived, only expressly authorized Stride collaborators can access it.

When personal data is no longer needed, and the legal archiving duration has expired, we irreversibly anonymize them or securely destroy them.

Changes to This Policy

This data protection policy is currently in effect and was last updated in March 2024. Any changes to this policy will be published via the Application.