



# ZIBRIO Website Privacy Policy

Created on 1/1/2020, last updated on 5/4/22

This Privacy Policy describes how your personal information is collected, used, and shared when you visit or make a purchase from [www.zibrio.com](http://www.zibrio.com) (the “Site” or “Website”).

View terms and conditions for purchasing from the site [here](#).

## Personal Information We Collect

When you visit the Site, we automatically collect certain information about your device, including information about your web browser, IP address, time zone, and some of the cookies that are installed on your device. Additionally, as you browse the Site, we collect information about the individual web pages or products that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site. We refer to this automatically-collected information as “Device Information.”

We collect Device Information using the following technologies:

- “Cookies” are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>. [See also our separate Cookies Policy.](#)
- “Log files” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “Web beacons,” “tags,” and “pixels” are electronic files used to record information about how you browse the Site.

Additionally, when you make a purchase or attempt to make a purchase through the Site, we collect certain information from you, including your name, billing address,

shipping address, payment information (including credit card numbers), email address, and phone number. We refer to this information as “Order Information.”

When we talk about “Personal Information” in this Privacy Policy, we are talking both about Device Information and Order Information.

### **How do we use your personal information?**

We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site, and to assess the success of our marketing and advertising campaigns).

We use the Order Information that we collect generally to fulfill any orders placed through the Site (including processing your payment information, arranging for shipping, and providing you with invoices and/or order confirmations). Additionally, we use this Order Information to: Communicate with you; Screen our orders for potential risk or fraud; and When in line with the preferences you have shared with us, provide you with information or advertising relating to our products or services.

### **How do we get your consent?**

When you provide us with order information to complete a transaction, verify your credit card, place an order, arrange for a delivery or return a purchase, we imply that you consent to our collecting it and using it for that specific reason only.

If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.

Any time after you opt-in, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, by contacting us at [info@zibrio.com](mailto:info@zibrio.com) or mailing us at: 2450 Holcombe Blvd.  
Houston, Texas, 77021

### **Sharing your Personal Information**

In general, the third-party providers used by us will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related

transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers. For example, we use SquareSpace to power our online store—you can read more about how they use your Personal Information here:

<https://www.squarespace.com/privacy>. We also use Google Analytics to help us understand how our customers use the Site—you can read more about how Google uses your Personal Information here:

<https://www.google.com/intl/en/policies/privacy/>. You can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

Once you leave our store's website or are redirected to a third-party website or application or link, you are no longer governed by this Privacy Policy or our website's Terms of Service.

In addition, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for information we receive, or to otherwise protect our rights.

### **Behavioral Advertising**

As described above, we use your Personal Information to provide you with targeted advertisements or marketing communications we believe may be of interest to you. For more information about how targeted advertising works, you can visit the Network Advertising Initiative's ("NAI") educational page at <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

You can opt out of targeted advertising by:

FACEBOOK – <https://www.facebook.com/settings/?tab=ads> GOOGLE – <https://www.google.com/settings/ads/anonymous> BING – <https://advertise.bingads.microsoft.com/en-us/resources/policies/personalized-ads>

Additionally, you can opt out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

### **Do Not Track**

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

### **Data Retention**

When you place an order through the Site, we will maintain your Order Information for our records unless and until you ask us to delete this information. We do not have any access to your payment information.

### **Security**

We have reasonable and appropriate physical, electronic, and administrative measures in place to safeguard the security of your personal information. Unfortunately, no transmission of information over the Internet nor storage of information electronically can be guaranteed to be 100% secure. Importantly, when you communicate with customer service via email or chat on our websites, these communications may not be encrypted. For that reason, we ask that you do not share sensitive information (passwords, health conditions, payment information, etc.) via these communication channels.

### **Changes**

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons.

### **Contact Us**

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail at [info@zibrio.com](mailto:info@zibrio.com) or by mail using the details provided below:

2450 Holcombe Blvd, Suite X, Houston, TX, 77021, United States

The following Addendums for our California and international customers apply to information we may collect through our website or app- paired or not with a Stability Home scale.

### California Addendum

California Civil Code 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 (the “CCPA”) requires organizations to disclose whether certain categories of information are “sold” or transferred for an organization’s “business purpose” as those terms are defined under the CCPA. You can find a list of the categories of information that we collect on our own behalf and how we share that information here. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. We are providing this CCPA-specific privacy notice to supplement the information and disclosures already contained in our privacy policy. If you need more assistance regarding your rights, please email us at: [gal@zibrio.com](mailto:gal@zibrio.com).

**Note** that while a category may be marked that does not necessarily mean that we have information in that category about you.

Category of Personal Information That We Collect	To Whom We Disclose Personal Information for Business Purpose	To Whom We Sell Personal Information
<b>Identifiers:</b> email address, full name, birthdate, height, gender, shoe size, unique device identifier, IP address, operating system, browser type, and mobile network information.	Service Providers  Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law	None
<b>Health/Wellness information you share with us through our app:</b> sleep, medications, mood, medical conditions, fitness, and strength, falling history.  <b>Health/Wellness information we share with you:</b> BMI and balance score/analysis.	Service Providers  Government entities, law enforcement, lawyers, auditors, consultants and other	None

	parties as required by law	
<b>Financial information:</b> When you purchase a product or a subscription through our website, we may collect billing address, shipping address, payment information (including credit card numbers), email address, and phone number, or other financial information.	Service Providers Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law	None
<b>Commercial information:</b> such as information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Service Providers Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law	None
<b>Network activity data:</b> internet or other electronic network activity information, such as browsing history, search history, and information regarding an individual's interaction with an internet website, application, or advertisement.	Service Providers Government entities, law enforcement, lawyers, auditors, consultants and other parties as required by law	None
<b>Geolocation data:</b> None	None	None
<b>Electronic and sensory data:</b> None	None	None

### Your California Privacy Rights

If you are a California resident, you may exercise the following rights (please note that for most information, you may access, change and delete your personal information on your own through the app):

**Right to Know and Access.** You may submit a verifiable request for information regarding the: (1) categories of personal information collected or disclosed by us; (2) purposes for which categories of personal information are collected by us; (3) categories of sources from which we collect personal information; and (4) specific pieces of personal information we have collected about you during the past twelve months.

**Right to Delete.** Subject to certain exceptions, you have the option to delete personal information about you that we have collected from you.

**Verification.** Requests for access to or deletion of personal information are subject to our ability to reasonably verify your identity in light of the information requested and pursuant to relevant CCPA requirements, limitations, and regulations.

**Right to Equal Service and Price.** You have the right not to receive discriminatory treatment for the exercise of your CCPA privacy rights, subject to certain limitations.

**Shine the Light.** We do not rent, sell, or share your personal information with nonaffiliated companies for their direct marketing purposes, unless we have your permission.

**Submit Requests.** You may access, change and delete your personal information and account through the App. you can also reach out to us at [gal@zibrio.com](mailto:gal@zibrio.com).

## **EEA/UK Addendum**

The following Addendum applies to customers who reside in the European Economic Area ("EEA") and the United Kingdom, the provisions of which shall prevail over conflicting provisions in this Privacy Policy for EEA/UK residents only.

### **Data controller**

For the purposes of data protection law, the controller is ZIBRIO, INC., which can be contacted at:

**Address:** Privacy Officer, 2450 Holcombe Blvd, Houston, Texas, 77021.

**Email:** [gal@zibrio.com](mailto:gal@zibrio.com)

### **Types of information we collect**

Generally, we collect information from people in the EEA/UK in a similar manner, and for similar legitimate business purposes, as described above.

### **Our legal basis for processing**

Our legal basis for processing your personal information will typically be one of the following:

- **Consent.** You have actively consented for us to process data by completing a form on the site, or have indicated your consent with another affirmative act.
- **Legitimate interests.** We have a Legitimate Interest in processing your personal data, and our reasons for it do not override your data protection rights. Our Legitimate Interests in processing your personal information are:
  - o to ensure our Services meet the high standard of usability and security you would expect;
  - o to help us identify areas for improvement;
  - o to enable us to communicate effectively regarding our Services; and
  - o to enable us to process applications, contacts, queries, or complaints.
    - **Legal obligation.** It is necessary for us to process your personal information for us to comply with our legal or regulatory obligations.
    - **Contractual obligation.** It is necessary for us to process your personal information to perform the tasks associated with a contract to which you are a party, or to take steps at your request prior to you entering into a contract.

### Your data rights

In addition to your rights described in the general Privacy Policy, EEA/ UK residents have certain other rights defined in the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. We will handle your request in accordance with the law. This means there may be legal reasons why we cannot fulfill all requests.

- **Consent withdrawal.** You have the right to withdraw your consent in relation to our processing of your personal information based on your consent. You can unsubscribe from our marketing/ app notification emails at any time by contacting us or by clicking on the “unsubscribe” link.
- **Erasure.** You have the right to request the deletion of your personal information in certain circumstances.
- **Restriction of processing.** You have the right to request that we restrict the processing of your personal information in certain circumstances.
- **Object to processing.** You have the right to object to the use or disclosures of your personal information in certain circumstances.
- **Data portability.** You have the right to request we transmit your personal information to you or another company in certain circumstances.

We process all requests in accordance with the law, and there may be legal reasons why we cannot fulfill all requests. To exercise these rights, please contact us at [gal@zibrio.com](mailto:gal@zibrio.com).



## **International transfer**

We operate in the United States and transfer, store, and process personal information outside of the EEA/UK, using applicable approved data transfer mechanisms (for example, Data Processing and IDTA agreements) to ensure that your personal data is adequately safeguarded.

## **Cookies**

With appropriate consent, we use cookies to help us collect, analyze, improve, secure, and market our website, and to support functionality which enhances your browsing experience. We do not use cookies through our app. For more information, please see our separate Cookies Policy.

## **Questions & Concerns**

If you have any comments or questions, or are concerned about the way in which we have handled any privacy matter, you can contact us:

gal@zibrio.com

## **Complaints (UK)**

We hope that we will be able to resolve any questions or concerns you have. However, you also have the right to lodge a complaint about our processing of your personal information with the Information Commissioner's Office, which is the Supervisory Authority in the UK. Contact details are as follows: <https://ico.org.uk/concerns/> or 0303 123 1113 or [casework@ico.org.uk](mailto:casework@ico.org.uk).

## **Australia Addendum**

The following applies to our customers from Australia. We are committed to the Australian Privacy Principles (APPs) as set out in the Privacy Act 1988 (Privacy Act).

Therefore, we will: disclose to you what personal information we collect about you and how we use it; store your information securely; and allow you to exercise the following rights:

- Right of access to the personal information held about you;
- Right of correction to correct or change your information; and
- Right to consent or reject the processing of personal information.

These principles and rights are reflected throughout our general privacy policy.

To exercise these rights, you may access, change and correct personal information on your own via the app, or you may contact us at gal@zibrio.com and reference

your Australian privacy rights. We may need to request specific information from you to help us confirm your identity and that you are entitled to make such a request. This is to ensure that personal information is not disclosed to any person who has no right to receive it.

#### Sensitive Information

If it is necessary to provide specific services to you, we may collect and use an information about you which is sensitive information under the Privacy Act. Under the Privacy Act, “sensitive information” includes but is not limited to health information about an individual. We will only collect and use sensitive information from you if you agree to provide it to us, you authorize us to obtain it from a third party or where the collection of the information is required or authorized by or under an Australian law or a Court/Tribunal order or otherwise where the collection is not prohibited under the Privacy Act. We will only use sensitive information in accordance with the Privacy Act and for the purpose for which it is provided. For more information about the processing of health information please see our separate HIPAA Privacy Notice.

#### Disclosure of Personal Information to Overseas Recipient

We may disclose your personal information to a third-party service providers (currently, Galen Data, Inc and Squarespace) located outside Australia for the purposes indicated in the privacy policy. Please note that some of our third-party service providers may include cloud-based service provider who may store and process personal information in the cloud within or outside Australia. ZIBRIO may, for the purposes indicated in the privacy policy, store, process or use your personal information on the cloud located within or outside Australia. It is our policy to share your personal information overseas in a way that requires the strictest privacy and security standards, during transit and at the overseas location. We take reasonable steps to ensure that the overseas recipients of your personal information are bound by a substantially similar or comparable privacy standards.

#### Third-party online advertising

We use third party providers to present advertising relevant to your interests when you access our website, generated from data relating to your access and use of the website and your other browsing history. These third party providers place cookies on your browser (see our Cookies Policy for more information) to collect information about your past use of our website and then places ads on sites across the Internet that are more likely to be of interest to you.

In Australia, the Australian Digital Advertising Alliance (“ADAA”) has developed the Australian Guideline for Third Party Online Behavioral Advertising. More information and an opt out page to manage online behavioral advertising preferences with ADAA member companies are available at <https://www.youronlinechoices.com.au/>.

See also: Network Advertising Initiative (NAI) <http://optout.networkadvertising.org/>  
Digital Advertising Alliance (DAA) – <http://optout.aboutads.info/> Digital Advertising Alliance EU (EDAA) – <http://www.youonlinechoices.com/> DAA AppChoices page – <http://www.aboutads.info/appchoices>.

### **Contact us**

If you need further assistance, please contact us at [gal@zibrio.com](mailto:gal@zibrio.com).

If you have contacted us with a privacy related complaint and you are not satisfied with our handling of that complaint, you may refer that complaint to the Office of the Australian Information Commissioner:

**Address:** Office of the Australian Information Commissioner, GPO BOX 5218, Sydney NSW 2001

**Telephone:** 1300 363 992

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

### **Canada Addendum**

The following applies to our customers from Canada. This Privacy Policy complies with the requirements of the Personal Information Protection and Electronic Documents Act (PIPEDA)- [PIPEDA fair information principles - Office of the Privacy Commissioner of Canada](#). Under Canadian law, you have a right to access any personal information we hold about you. Most personal information is accessible to you at any time to view and correct through our app. Notwithstanding, you may ask us to access and/or correct your information by contacting us at [gal@zibrio.com](mailto:gal@zibrio.com). Please note that we may require you to send us proof of your identity before providing you with access to your personal information. If you send us a request to access or correct information, then we will contact you within 30 days (although it may take us longer to fully respond to your request).

Please view our general privacy policy and HIPAA Privacy Notice to learn what personal information we collect and for what legitimate purposes, how we use or share personal information with third parties, how we store and protect personal information, and how you may consent or object to email communications with us.

Interest-Based Ads – Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based advertising from their members. To opt-out of website interest-based advertising provided by each organization’s respective participating companies, visit the DAA’s opt-out portal available at <http://optout.aboutads.info/>, the DAA of Canada’s opt-out portal available

at <https://youradchoices.ca/en/tools>, or visit the NAI's opt-out portal available at <http://optout.networkadvertising.org/?c=1>.

### **Contact us**

If you have any questions, or complaints, regarding the collection or use of your personal information, or if you wish to withdraw your consent to us using your data, please contact us at [gal@zibrio.com](mailto:gal@zibrio.com).

If you are not satisfied with our response to your query or complaint, you may also contact the Office of the Information and Privacy Commissioner of Canada at this link: <https://www.priv.gc.ca/en/contact-the-opc/>