

Privacy Policy

Last Updated: August 11, 2022

Introduction

This Privacy Policy outlines The VDOC LLC, and/or its owners, agents, employees, representatives, or affiliates and assigns ("**we**", "**our**" or "**Company**") practices with respect to information collected from users who access our website at <https://www.thevdoc.com/> and related platforms ("**Site**"), or otherwise share personal information with us (collectively: "**Users**").

This Privacy Policy applies to the Site, and any services and applicable products ("**Services**"). We may update this Privacy Policy, from time to time, at our sole discretion.

Your use of the Site after an updated Privacy Policy becomes effective will indicate your acceptance; therefore, we encourage you to periodically review this Privacy Policy and the Site in order to keep apprised of our current privacy statement.

When you use the Site, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Privacy Policy. We encourage our Users to carefully read the Privacy Policy and use it to make informed decisions.

Grounds for Collection

When you use Site, we may collect and use personal information about you or that directly or indirectly identifies you or another individual ("**Personal Information**"). We may also collect and use Non-Personal Information (as defined below). We use Non-Personal Information to facilitate our operation of our Site and for other purposes as described below.

We use the information we collect for the following reasons:

- When necessary to perform Services
- If it is necessary for our legitimate interest, for example: (i) to keep our records updated; (ii) to explore how customers use our Services; (iii) to offer additional features to our customers; (iv) to prevent fraud or monitor for security vulnerabilities; (v) to keep our Site updated and relevant; (vi) to develop our business; (ix) and to inform our marketing strategy (by delivering Site content and advertising to you).
- For our business purposes, including without limitation, data analysis, audits, fraud and abuse monitoring and prevention, detecting security vulnerabilities, identifying technical errors, for testing products and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- As we believe to be necessary or appropriate: (i) under applicable law; (ii) to comply with legal process; (iii) to enforce our terms and conditions; (iv) to protect our operations; (v) to protect our rights, privacy, safety or property, and/or that of our

affiliates, you or others; and (vi) to allow us to pursue available remedies or limit the damages that we may sustain.

Type of Information

We collect two types of data and information from Users.

The first type of information is un-identified and non-identifiable information pertaining to a User(s), which may be made available or gathered via your use of the Site, and/or which has been anonymized, deidentified, or aggregated (“**Non- Personal Information**”). We are not aware of the identity of a User from which the Non-personal Information was collected. Non-Personal Information which is being collected may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time, etc.) in order to enhance the functionality of our Site. We may also collect information on your activity on the Site (e.g. pages viewed, online browsing, clicks, actions, etc.).

The second type of information **Personal Information** which is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual. Such information includes:

- **Device Information:** We collect Personal Information from your device. Such information includes geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Site.
- **Registration information:** When you register to our Site you will be asked to provide us certain details such as: full name; e-mail or physical address, and other information.
- **Contact Information:** When you contact us through our Site you will be asked to provide certain details such as: full name, e-mail, phone number and other information.
- **Payment Information:** When you buy our services through the website you will submit your payment and billing information in order to purchase our services
- **Personal information:** When you register for our service you will be asked to provide certain information including your full name, email address, physical address and some basic information about your child (name, allergies, age, position on the team, additional notes i.e. asthma) who is part of the club.

Collection of Information

We receive your Personal Information from various sources:

- When you voluntarily provide us your Personal Information in order to register on our Site;
- Automatically when you use or access our Site in connection with your use of our

Services, this may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, geolocation, information about how and when you use the Site and other technical information.

- From third party providers, services and public registers (for example, traffic analytics vendors).

Use of information

We do not rent, sell, or share Users' information with third parties except as described in this Privacy Policy.

We may use the information for the following:

- To register a User or an interested party;
- To communicate with you – sending you notices regarding our services, providing you with technical information and responding to any customer service issue you may have;
- To deliver interest-based content to you, including marketing and advertising material (see more under "Third Party Collection and Use");
- To communicate with you and to keep you informed of our latest updates and services;
- To send administrative information to you, such as changes to our terms, conditions and policies, or other similar information;
- To market our Services and related products (see more under "Third Party Collection and Use");
- Conducting statistical and analytical purposes, intended to improve the Site.

In addition to the different uses listed above, we may transfer or disclose Personal Information to our affiliated companies, agents, and service providers, who may be located in different jurisdictions across the world, for any of the following purposes:

- Hosting and operating our Site;
- Providing you with our Services, including providing a personalized display of our Site;
- Storing and processing such information on our behalf;
- Serving you with advertisements and assist us in evaluating the success of our advertising campaigns and help us retarget any of our users;
- Providing you with marketing offers and promotional materials related to our Site and services;
- Performing research, technical diagnostics or analytics;

- Providing you with our services including processing payments, managing your account and providing you will the full functionality of our services that you use.

We may also disclose information if we have good faith to believe that disclosure of such information is helpful or reasonably necessary to:

(i) comply with any applicable law, regulation, legal process or governmental request;

(ii) enforce our policies (including our Agreement), including investigations of potential violations thereof;

(iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues;

(iv) to establish or exercise our rights to defend against legal claims;

(v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or

(vi) for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

(vii) to protect the legal rights, personal/real property, or personal safety of The VDOC, our Users, employees, and affiliates.

Retention of Information

Where we act as the data controller of Personal Information, we retain the Personal Information we collect where we have an ongoing legitimate business need to do so (for example to comply with applicable legal, tax or accounting requirements). When we have no ongoing legitimate business need to process your Personal Information, we will either delete or aggregate it or, if this is not possible, then we will securely store your Personal Information. However, we will make good faith efforts to delete your personal information if you contact us by following the opt-out mechanism in this Privacy Policy, provided that we are not required to retain it by law or for legitimate business purposes. We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

Cookies and Other Technologies

We and our trusted partners use cookies and other technologies in our related services, including when you visit our Site or access our services.

A "cookie" is a small piece of information that a website assign to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier. Cookies are also used to help ensure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

For more information, please see our [Cookie Policy](#).

Transfer Internationally

Our servers are located in the United States. However, if you are accessing our Site from outside the United States, your personal information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Site or disclosing information to us you consent to the transfer of information to countries outside of your country of residence, which could have different data protection rules than those of your country or the country in which you were located when you initially provided the information. We will put in place adequate measures to ensure that your Personal Information is kept secure (and such adequate measures shall include: (i) transferring to a jurisdiction which the UK and/or European Commission recognizes as providing adequate protection for the rights and freedoms of data subjects in connection with the processing of the Personal Information; (ii) transferring in accordance to the EU and UK General Data Protection Regulation (collectively "GDPR"); and (iii) transferring pursuant to GDPR Standard Contractual Clauses ("Model Clauses").

Where we are a processor on your behalf as a controller, we act under our [Data Processing Agreement](#) ("DPA"). This DPA sets out our commitment to privacy and security when processing personal information in connection with the provision of the Services for the transfer of personal information outside the European Economic Area (EEA), United Kingdom (UK), or Switzerland.

For additional information on GDPR please refer to our [GDPR Policy](#).

Safeguard and Security

We have implemented appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed, and we require any applicable third party to comply with similar security requirements, in accordance with this Privacy Policy. Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Site, and we make no warranty, express, implied or otherwise, that we will prevent such access. The security of your Personal Information is important to us but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security. You should only access the Site within a secure environment.

Third Party Collection and Use

We contract with other companies and people to perform tasks on our behalf, and we share your personal information with some of them to provide the Services to you, to operate the Site, or to otherwise communicate with you, such as to provide advertising or marketing offers on our behalf. Examples of these agents or service providers, include Cloud Computing Services, Data Analytics Services, Hosting Service Providers, or Advertising and Marketing Tools. When we share your Personal Information, we require the agent or service provider to maintain the privacy, confidentiality and security of your Personal Information.

You may be able to control the amount of information that is accessible by adjusting your account privacy settings. For example:

Advertisements

We may use a third-party advertising technology to serve advertisements when you access the Site. This technology uses your information with regards to your use of the Services to serve advertisements to you (e.g., by placing third-party cookies on your web browser).

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"). For more information about this practice by NAI and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites: <http://optout.networkadvertising.org/#/> and <http://optout.aboutads.info/#/>.

Marketing

We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning our services, which we believe may interest you.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. If you unsubscribe, we will remove your email address or telephone number from our marketing distribution lists.

Please note that even if you have unsubscribed from receiving marketing emails from us, we may send you other types of important e-mail communications without offering you the opportunity to opt out of receiving them. These may include customer service announcements or administrative notices.

Our Site may also include interactive programs that are hosted by a third party. Your interactions with these features are governed by the privacy policy of the company providing it. Please be aware that when you are on the Site, or when you receive an email message from us through the Services, you could be directed to other sites that are beyond our control. There may be links to other websites from the Site's pages or from the email message we send to you that take you outside our Site. These other sites may send their own cookies to visitors, collect data, or solicit personal information. The privacy policies of these websites may be significantly different from this Privacy Policy. We are not responsible for the privacy practices of these other websites and cannot guarantee the security of any of your personal information collected therein. You may

be able to control the amount of information that is accessible by adjusting your account privacy settings on such third-party services, including without limitation the right to opt out these features or programs therein.

User Rights

In some regions, you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your Personal Information. To make such a request, please use the contact information provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your Personal Information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

EEA, UK, Switzerland

If you are a resident in the EEA, Switzerland, or UK, your rights under GDPR include: (i) request access to and obtain a copy of your personal data; (ii) request rectification (or correction) of inaccurate personal data you have provided; (iii) request erasure (or deletion) of personal data that is no longer necessary to fulfill the purposes for which it was collected, or does not need to be retained by Microsoft for other legitimate purposes; (iv) restrict or object to the processing of your personal data; and (v) if applicable, request your personal data be ported (transferred) to another company.

If you are a resident in the EEA, Switzerland, or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm; <https://ico.org.uk/>.

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

California

If you are a California resident, you can make certain requests regarding your personal information, including: (i) you may request access to a copy of the personal Information we have about you, including a list of categories of your personal information that we have shared with another company for a business purpose; (ii) you may request that we delete your personal information; (iii) you may request that we stop sharing your personal information; or (iv) you may request the right not to be discriminated against. You can find pertinent authority here: <https://oag.ca.gov/privacy>

For additional information as to how to exercise your rights, or if you are unsure about your rights or are concerned about how your personal information may be processed, please contact us at info@thevdoc.com.

CCPA Privacy Notice

California Consumer Privacy Act of 2018, Cal. Civil Code § 1798.100 et seq. ("CCPA"), defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

For the purposes of this CCPA notice to residents, the following additional definitions shall apply:

"business purpose" as defined in Subdivision (d) of Cal. Civ. Code § 1798.140;

"collection" as defined in Subdivision (e) of Cal. Civ. Code § 1798.140;

"sale" as defined in Subdivision (t) of Cal. Civ. Code § 1798.140;

"service provider" as defined in Subdivision (v) of Cal. Civ. Code § 1798.140.

The collection of Personal Information in the course of fulfilling the Services, does not constitute a sale of such Personal Information. We act as service provider with respect to such Personal Information. Therefore, we represent and warrant that we will process Personal Information only for the permissible business purposes. We shall cooperate if an individual requests (i) access to his or her Personal Information, (ii) information about the categories of sources from which the Personal Information is collected, or (iii) information about the categories or specific pieces of the Personal Information, including by providing the requested information in a portable and, to the extent technically feasible, readily useable format that allows the individual to transmit the information to another entity without hindrance.

Opt-Out

We offer you the chance to "opt-out" from having your personally identifiable information used for particular functions, when we ask you for this detail. When you register for the website, if you do not want to receive any additional material or notifications from us, you can show your preference on our registration form. Alternately please feel free to contact us via our contact form or via email to info@thevdoc.com.

Corporate Transactions

We may share information in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, consolidation or asset sale). In the event of the above, the transferee or acquiring company will assume the rights and obligations as described in this Privacy Policy.

Minors

We are committed to protecting the privacy of children who may use or access the Site, or Users that otherwise may share personal information from a child. This notice of the policy is in accordance with the Children's Online Privacy Protection Act ("COPPA"), and contains important information about how we may collect, use, and disclose the potential personal information we may collect from children under 13 years old.

We develop and makes available coaching online courses on the Site. Our Site offers a variety of activities that are solely intended to be used by adult Users, and not targeted to children. However, because of the nature of our services, below we summarize potential instances of collection and outline how and when we will provide parental notice and/or seek parental consent. In any instance that we collect personal information from a child, we will retain that information only so long as reasonably necessary to for a legitimate interest like ensuring security, to fulfill a request, or to provide our services, or as otherwise required by law.

In the event we discover we have collected information from a child in a manner inconsistent with COPPA's requirements, we will either delete the information or immediately seek the parent's consent for that collection.

Parental Consent

In the event we ever wish to collect personal information from a child, COPPA requires that we first seek a parent or guardian's consent by email. In the email we will explain what information we are collecting, how we plan to use it, how the parent can provide consent, and how the parent can revoke consent. If we do not receive parental consent within a reasonable time, we will delete the parent contact information and any other information collected from the child in connection with that activity.

If you believe your child is participating in an activity that collects personal information and you or another parent/guardian have not received a notice or request seeking your consent, please feel free to contact us at info@thevdoc.com.

Aggregate or De-identified Information.

We may use aggregate or de-identified information about children for research, analysis, and similar purposes. When we do so, we strip out names, e-mail, contact information, and other personal identifiers. We may use aggregate or de-identified information for the following purposes: (i) to improve our Site and services; or (ii) to conduct research or analysis.

In the rare occasion we may have access to personal information, in accordance and subject to COPPA, we may share or disclose such personal information in a limited number of instances, including the following: (i) we may share information with our service providers if necessary for them to perform a business, professional, or technology support function for us; (ii) we may disclose personal information if permitted or required by law, for example, in response to a court order or a subpoena. To the extent permitted by applicable law, we also may disclose personal information (i) in response to a law enforcement or public agency's (including schools or children services) request; (ii) if we believe disclosure may prevent the instigation of a crime, facilitate an investigation related to public safety or protect the safety of a child using our sites or applications; (iii) to protect the security or integrity of our Site and other technology, as well as the technology of our service providers; or (iv) enable us to take precautions against liability.

To the extent a child access our Site for certain activities, these activities do not require children to provide any personal information and therefore may not result in notice to the parent or require parental consent. If an activity potentially allows a child to insert personal information in their created content, we will either pre-screen the submission to delete any personal information, or we will seek verifiable parental consent by email for the collection.

At any time, parents can refuse to permit us to collect personal information from their children in association with a particular account and/or can request that we delete from our records the personal information we have collected in connection with that account.

Updates to Privacy Policy

We reserve the right to periodically amend or revise the Privacy Policy; material changes will be effective immediately upon the display of the revised privacy policy. The last revision will be reflected in the "Last modified" section. Your continued use of the Platform, following the notification of such amendments on our website, constitutes your acknowledgment and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

Contact Us

If you have any general questions about the Site or the information, we collect about you and how we use it, you can contact us at info@thevdoc.com.

VDOC, LLC

813 Harris Dr, Gallatin,
Tennessee, 37066, United States