

Privacy Policy

This Privacy Policy describes the types of information gathered by [Braw.ly](#) (“Brawly”, “us” or “we”) in the process of providing this computing application and the data, services, information, tools, functionality, updates and similar materials provided therethrough (collectively, the “Service”), how we use it, with whom the information may be shared, what choices are available to you regarding collection, use and distribution of information and our efforts to protect the information you provide to us through the Service. By using the Service, you hereby consent to allow us to process information in accordance with this Policy.

This policy is subject to change. If our information retention or usage practices change, we will let you know by posting the Privacy Policy changes on the Service and/or otherwise making you aware of the changes.

Territoriality

Regardless of where our servers are located, your personal data may be processed by us in the United States, where data protection and privacy regulations may or may not be to the same level of protection as in other parts of the world. BY VISITING THE WEBSITE AND USING THE SERVICE, YOU UNEQUIVOCALLY AND UNAMBIGUOUSLY CONSENT TO THE COLLECTION AND PROCESSING IN THE UNITED STATES OF ANY INFORMATION COLLECTED OR OBTAINED BY US THROUGH VOLUNTARY SUBMISSIONS, AND THAT U.S. LAW GOVERNS ANY SUCH COLLECTION AND PROCESSING.

Information Collected

We collect certain Personal Information about you, which may be supplied when you sign-up for the Service, when you complete a survey, when you create or update an account, when you use the Service, when you request services or otherwise when you submit such information. The information that may be collected includes:

- Name;
- Email;
- Username;
- Social Media account names and information;
- Information from your activities on the Service;

We may also collect information about you from third-party sources, including but not limited to gaming platforms (such as Discord), and combine it with data we collect directly from you, including from gaming or other third-party platforms.

Although the Service may ask for a payment card or other banking information at times to facilitate transactions on the Service, we collect this information through a third-party PCI compliant processor, and we do not take possession of your information.

Anonymous Information

Anonymous Information is collected about you when you use the Service, including but not limited to links and materials posted, enrollment history, purchase history, the type of device

you used and its operating system, the pages accessed most frequently, how pages are used, applications downloaded, search terms entered, and similar data.

Automatically Tracking Internet Protocol (IP) addresses is one method of automatically collecting information about your activities online and information volunteered by you. An IP address is a number that is automatically assigned to your device whenever you surf the internet. Further, the Service may utilize web beacons, pixel tags, cookies (including third-party cookies), embedded links, and other commonly used information-gathering tools. The Service may also collect device identifiers.

Although it may be possible to turn off the collection of cookies through your device, that may interfere with your use of the Service. In addition, if you receive targeted advertisements based on your browsing patterns, you may be able to opt-out of such advertisements through links available in such advertisements at that time, such as through an AdChoices icon.

Part of the purpose of the Service may be to share materials you make available. Anything you publicly post or direct to be made public, such as if you share a session on a public media platform, will not be considered Personal Information, and will be outside the restrictions of this policy.

Use of Information

Internal Use of Information

We accept and gather Personal Information in an effort to provide the Service to you. We may also use Personal Information to help us develop and improve our Service, fulfill your requests, send materials to you, inform you about our offers and those of others, perform research, tailor our Service to meet your interests, and for other purposes permitted by law.

We may use Anonymous Information or non-Personal Information for any business purpose.

Sharing Information Collected with Third Parties, Consultants, and Affiliates

We may share Personal Information with our business associates, consultants, service providers, advisors and affiliates in order for them to provide services to us, to you, and to enable us to provide the Service. For example, our host and internet service provider may have access to this information.

We may provide other companies with statistical information about our users -- but this information will not be used to identify any individual user.

We may incorporate your Personal Information into an aggregate databases, using industry standard methodology to anonymize the data, and we may use such anonymous aggregate databases for our general business purposes, including sharing such databases and any analyses derived therefrom with others.

Trainers profile pages are public, and as such, any personal information and content you make available on those pages will be publicly available.

Our Service may use Google Analytics and Yandex Metrika, a web analytics services provided by Google, Inc. ("Google") and Yandex, LLC ("Yandex"). Google Analytics and Yandex Metrika uses cookies, to help us analyze how users use the Service. You may be able to opt-out of Google's or Yandex's collection. In addition, we may use other analytics platforms that may collect similar information during your use of the Service.

Further, we may disclose collected information to the extent we believe it necessary to comply with the law, such as in response to a subpoena or court order, to defend a legal claim or otherwise as permitted by applicable law. We may disclose any information in our possession in the event that we believe it necessary or appropriate to prevent criminal activity, personal injury, property damage or bodily harm.

Additionally, we may transfer your information to successor in interest, which may include but may not be limited to a third-party in the event of an acquisition, sale, merger or bankruptcy. Under such a circumstance, this policy may no longer govern your data.

Links

Our Service may contain links to other websites or services. We are not responsible for the privacy practices of such other sites. When you leave our Service to visit another website or application, please read the privacy statements of websites that may collect personally identifiable information. This Privacy Policy applies solely to information collected by us through the Service.

Security

We employ industry standard organizational, procedural, and technical safeguards to secure data in our possession, consistent with the sensitivity level of such data. Regardless of the precautions we take, no transmission of data over the internet is guaranteed to be completely secure. It may be possible for third parties not under our control to intercept or access transmissions or private communications unlawfully. While we strive to protect personal information, we cannot ensure or warrant the security of any information you transmit to us.

E-Mail and Electronic Newsletters

We may offer electronic newsletters and e-mails concerning promotions, new products and services, or other marketing materials as a service to our users. You may receive newsletters and e-mails concerning promotions and marketing of ours, after you register through with the Service. If, after you have received a message, you no longer wish to receive such materials, you may opt-out by following the unsubscribe instructions included in each electronic newsletter and e-mail.

Other Data Protection Rights

You may have the following data protection rights

To access, correct, update or request deletion of Personal Information. We take reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete and up to date. As a registered user, you can manage many of your individual account and profile settings within the your account provided through the Brawly platform, or you may contact us directly by emailing us at hello@braw.ly. We will consider your request in accordance with applicable laws.

In addition, individuals who are residents of the EEA can object to processing of their Personal Information, ask to restrict processing of their Personal Information or request portability of their Personal Information. You can exercise these rights by contacting us at hello@braw.ly.

Similarly, if Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority.

Contact details for data protection authorities in the EEA are available [here](#).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request.

Communication Tools

The Service may contain tools that enable you to share personal information, including sensitive information, with others, through social media and in other ways. Should you choose to use such tools, please exercise caution when sharing sensitive information. The Service will not share this information in this manner without you directing it to do so.

Do Not Track

At this time, the Service does not specifically respond to do-not-track signals.

Children and Privacy

We do not knowingly permit users to register for our Service if they are under 18 years old, and therefore do not request personally identifiable information from anyone under the age of 18. If we become aware that a customer is under the age of 18 and has registered without prior verifiable parental consent, we will remove his or her personally identifiable registration information from our files. If you are the parent or guardian of a person under the age of 18 who has provided personally identifiable information to us without your approval, please inform us by contacting us at the e-mail address below and we will remove such information from our database.

California Privacy Rights

California law allows California residents to request information regarding our disclosures in the prior calendar year, if any, of their personally identifiable information to third parties. To make such a request, please contact us at hello@braw.ly with "Request for Privacy Information" in the subject line. Please include enough detail for us to locate your file; at a

minimum, your name, email, and username, if any. We will attempt to provide you with the requested information within thirty (30) days of receipt. We reserve our right not to respond to requests sent more than once in a calendar year, or requests submitted to an address other than the one posted in this notice. Please note that this law does not cover all information sharing. Our disclosure only includes information covered by the law.

Contact Information

If you have any questions or suggestions regarding our Privacy Policy, please contact us via e-mail at hello@braw.ly