KINGSIDE FITNESS, INC.

PRIVACY POLICY

Effective Date: June 30th 2026

PLAIN-LANGUAGE SUMMARY. This policy explains what information Kingside Fitness collects, where it is stored, who can see it, and your rights. Your biometric data (heart rate, HRV, sleep, and similar measurements) is collected by a Sensor Bio wearable device and stored on Sensor Bio's servers — not on Kingside Fitness's servers. Kingside Fitness displays that data back to you and provides fitness programming. We do not sell your data. We do not share your individual data with your fire department or employer. Your data will never be used for any employment decision. Kingside Fitness is not a HIPAA covered entity. The Platform is not a HIPAA-regulated service.

1. Who We Are

This Privacy Policy is issued by Kingside Fitness, Inc., a Texas corporation ("Kingside Fitness," "we," "us," or "our"). It describes how we handle information in connection with your use of the Kingside.Fit website and the Kingside Fitness app (together, the "Platform").

Kingside Fitness is a general wellness and fitness technology company. We are not a healthcare provider, and the Platform is not a medical service. We are not a "covered entity" or "business associate" as those terms are defined under HIPAA, and the Platform is not a HIPAA-regulated service. Data collected through the Platform is general wellness data, not Protected Health Information (PHI) under HIPAA

2. The Role of Sensor Bio

Biometric data collection, processing, and storage is provided by Sensor Biotech, Inc. d/b/a Sensor Bio ("Sensor Bio"), our wearable technology partner. Sensor Bio supplies the wearable device, the cloud processing platform that converts raw sensor signals into readable metrics, and the app you use to view your data. The Kingside Fitness app is a white-labeled version of Sensor Bio's application.

This distinction matters for your privacy: **your biometric data is stored on Sensor Bio's servers, not on Kingside Fitness's servers.** Sensor Bio is independently responsible for securing that data while it is stored and processed. Sensor Bio's privacy practices are described in its privacy policy at Sensor Bio.com, and we encourage you to review it.

3. Information We Collect

3.1 Biometric Data (collected by the device, stored by Sensor Bio)

The Sensor Bio wearable device uses optical (PPG) sensors, an accelerometer, and a gyroscope to passively measure the following while you wear it:

- Daytime metrics: heart rate, heart rate variability (HRV), respiratory rate, step count, and estimated active calories.
- Sleep-period metrics: total sleep duration, sleep latency, awake time and awakenings, light and deep sleep duration, nocturnal HRV, nocturnal heart rate, nocturnal respiratory rate, and a Sleep Score.

The Sleep Score is generated entirely by Sensor Bio's proprietary algorithm. Kingside Fitness displays it to you as Sensor Bio provides it; we do not calculate, modify, or independently verify it. Kingside Fitness does not store raw sensor waveform data and does not create any additional scores or derived metrics beyond what Sensor Bio delivers.

3.2 Information Kingside Fitness Collects Directly

Kingside Fitness collects a limited set of information directly from you:

- Enrollment and contact details, including your name and email address;
- Your fire department, shift, and station number;
- Platform usage data, such as which features you use and how you interact with the app; and
- Optional responses to wellness check-in questions that you choose to submit.

3.3 Website and App Technology

The Kingside Fit website uses a minimal number of functional first-party cookies solely to support Platform operation (for example, to remember display preferences). As of the effective date of this policy, we do not use Google Analytics, Meta Pixel, or other third-party advertising or behavioral tracking technology. We will update this policy and notify current users before implementing any additional tracking technologies beyond those described herein.

The Platform uses Supabase for authentication, database, and storage functions, and Formspree to process contact form submissions. These service providers process data on our behalf under confidentiality obligations.

4. How Your Information Moves

Understanding the path your data takes helps you understand who is responsible for it at each step:

- The Sensor Bio wearable device captures raw sensor signals from your wrist.
- Those signals are transmitted to the Kingside Fitness app (powered by Sensor Bio) on your phone.
- The app transmits raw signals to Sensor Bio's cloud servers for processing.
- Sensor Bio's platform processes the raw signals into the readable metrics and Sleep Score listed in Section 3.1.
- Sensor Bio returns those processed metrics to the app, which displays them to you.

Kingside Fitness does not hold your raw sensor data and does not maintain its own copy of your processed biometric data outside of what is displayed to you through the Platform.

5. How We Use Information

Kingside Fitness uses your information only for the following purposes:

- To provide you with the Platform experience — showing you your own metrics and delivering fitness programming and coaching;
- To operate, support, and troubleshoot the Platform;

- To generate aggregate, de-identified analysis of overall platform engagement across all users as a group; and
- To communicate with you about your account, program updates, and material changes to this policy.

WHAT WE DO NOT DO. We do not sell your identifiable data. We do not share your individual biometric data, sleep data, or platform activity with your fire department or any employer. We do not use your individual data for any employment decision, disciplinary action, fitness-for-duty determination, scheduling decision, or performance evaluation. We do not use your identifiable data for targeted advertising.

6. How We Share Information

We share information only in these limited circumstances:

- With Sensor Bio, our technology partner, which processes and stores your biometric data as described above;
- With service providers that help us operate the Platform (such as Supabase and Formspree), under confidentiality obligations;
- With fire departments, in aggregate and de-identified form only — for example, the total number of users actively using the Sensor Bio band, workout programming, or custom coaching across the department. No individual data is included in these reports, and no report is generated for any group of fewer than five active users;
- When required by law, such as in response to a valid legal process, or to protect rights and safety as permitted by applicable law.

We do not share your individually identifiable biometric data, Sleep Score, or platform activity with your fire department, employer, or any third party for any employment-related purpose.

7. Data Storage, Security, and Location

Your biometric data is stored and secured by Sensor Bio on its cloud infrastructure. Sensor Bio is responsible for maintaining commercially reasonable administrative, physical, and technical safeguards for that data, including encryption of data in transit (TLS 1.2 or higher) and at rest.

The limited account and usage information that Kingside Fitness holds directly is protected using industry-standard measures, including encryption in transit and at rest, and access controls that limit who can view it.

No method of electronic storage or transmission is perfectly secure. While we and Sensor Bio work to protect your information, we cannot guarantee absolute security.

8. Data Retention and Deletion

Kingside Fitness retains your identifiable information, including your name, email address, fire department, shift, and station, for the duration of your active subscription.

Upon termination or expiration of your subscription, Kingside Fitness will initiate deletion of your identifiable information within thirty (30) days where required by applicable law, including Washington state under the Washington My Health My Data Act. In other jurisdictions, Kingside Fitness will initiate deletion upon receipt of a verified deletion request, unless applicable law requires automatic deletion.

If you request deletion of your identifiable data before or after your subscription ends, contact us at info@kingside.fit. Kingside Fitness will process verified deletion requests within thirty (30) days and will direct Sensor Bio to delete your identifiable biometric data within that same thirty (30)-day period, consistent with Sensor Bio's technical deletion processes and any legal retention obligations.

Aggregate, de-identified information derived from platform activity may be retained without a fixed time limit because it cannot reasonably be linked to you individually. Once data has been fully anonymized, it can no longer be individually retrieved or deleted.

9. Your Choices and Rights

You have meaningful control over your information and your participation:

- Participation in the Kingside Fitness platform is voluntary. You may withdraw at any time, for any reason, without any effect on your employment.
- You may stop wearing the device at any time, which stops new biometric data collection.
- You may request access to, correction of, or deletion of the identifiable information Kingside Fitness holds about you.
- You may decline to answer any optional check-in or questionnaire item.

To exercise any of these rights, contact us at info@kingside.fit or 512-666-8248.

10. State-Specific Privacy Rights

10.1 Texas Residents — Texas Data Privacy and Security Act (TDPSA)

If you are a Texas resident, you have the following rights under the Texas Data Privacy and Security Act:

- The right to know whether we are processing your personal data;
- The right to access your personal data;
- The right to correct inaccuracies in your personal data;
- The right to delete your personal data;
- The right to obtain a copy of your personal data in a portable format; and
- The right to opt out of the sale of personal data, targeted advertising, or profiling. Kingside Fitness does not sell personal data, engage in targeted advertising using personal data, or engage in profiling that produces legal or similarly significant effects.

To exercise your Texas privacy rights, contact us at info@kingside.fit. We will respond within forty-five (45) days of a verified request, with one possible extension of an additional forty-five (45) days where reasonably necessary. We will not discriminate against you for exercising your rights.

10.2 Washington Residents — My Health My Data Act (MHMDA)

If you are a Washington state resident, additional protections apply to your consumer health data under the Washington My Health My Data Act. Biometric data such as heart rate, HRV, sleep metrics, and respiratory rate constitutes consumer health data under the MHMDA.

As a Washington resident, you have the right to:

- Confirm whether Kingside Fitness or Sensor Bio is collecting, sharing, or selling your consumer health data;
- Access a list of all third parties with whom your consumer health data has been shared;
- Withdraw your consent to the collection or sharing of your consumer health data; and
- Request deletion of your consumer health data.

Kingside Fitness does not sell consumer health data. We do not share your consumer health data with third parties except as described in Section 6 of this policy (with Sensor Bio as our technology provider and with service providers under confidentiality obligations).

To exercise your Washington MHMDA rights, contact us at info@kingside.fit. We will respond within thirty (30) days (as required by the MHMDA) of a verified request. You will not face any retaliation for exercising these rights.

11. No Employment Use of Data

Your biometric data, Sleep Score, platform activity, and any other information collected through the Kingside Fitness platform will never be used for any of the following purposes:

- Employment decisions, including hiring, termination, demotion, or promotion;
- Fitness-for-duty determinations;
- Disciplinary actions;
- Scheduling decisions; or
- Performance evaluations.

This prohibition is absolute. Fire departments and employers that contract with Kingside Fitness receive only aggregate, de-identified data at the group level, as described in Section 6. No individual data is accessible to your department or employer at any time.

12. This Is a Wellness Product, Not Medical Care

The biometric data and Sleep Score shown in the Platform are general wellness information for personal awareness only. They are not medical diagnoses, clinical findings, or fitness-for-duty determinations, and they are not a substitute for professional medical advice, diagnosis, or treatment.

The Platform does not monitor your data in real time and does not generate emergency alerts. In any medical emergency, call 911.

13. Children’s Privacy

The Platform is intended only for adults aged eighteen (18) or older. We do not knowingly collect information from anyone under eighteen. If we learn that we have collected information from a person under eighteen, we will delete it promptly.

14. Changes to This Policy

We may update this Privacy Policy from time to time. If we make a material change, we will update the effective date at the top of this policy and notify current users by email. We encourage you to review this policy periodically. Continued use of the Platform after notification of a material change constitutes your acceptance of the updated policy.

15. How to Contact Us

For questions about this policy, or to exercise any right described here, contact:

Kingside Fitness, Inc.
3571 Far West Blvd #3122
Austin, TX 78731
Email: info@kingside.fit
Phone: 512-666-8248