

Hamptons Gym Corp (HGC) Privacy Statement

As the leading Hampton's health club operator, HGC needs a wide range of "personal information" in order to carry out its business. "Personal information" is information from which you can be identified. This Privacy Policy explains HGC's approach to the handling of personal information, and how we comply with our privacy obligations.

1) What personal information does HGC collect and why?

HGC collects personal information from its members and from membership applicants, contractors, employees, and people we do business with.

HGC needs personal information to:

- provide its members with personalized fitness services and;
- conduct our business (ie. Administer accounts, charge fees and to communicate with our members and business contacts.

To illustrate, the personal information we collect about our members includes:

-Identification Information, including each member's name, address, contact details (including telephone numbers and e-mail addresses), date of birth and drivers license number;

-Health information, including information we collect in the course of memberships.

-Financial Information, including bank account details and credit card details, as well as information about payment or non-payment of membership fees.

We need this personal information to provide health and fitness services, and is collected through application forms, and when members attend our clubs and communicate with us through our website.

2) How does HGC use personal information?

As indicated, we use personal information to provide fitness and health services, to manage and administer club memberships and to operate our business.

For example, if you are a member, we will use your personal information to process your membership application, charge you membership fees and administer your account. We will also use your personal information to communicate with you, including answering any enquiries you may have.

Unless you tell us otherwise, we may also use members' personal information to mail or e-mail special promotions, newsletters and other marketing material.

3) Does HGC share my personal information with anyone else?

HGC will disclose your personal information in a few different ways.

Like most businesses, sometimes we outsource or "contract out" specific support services from time to time, and this may mean that our contractors see your personal information. For instance, sometimes we may engage IT contractors to maintain our database. All our contractors are subject to strict confidentiality obligations, which mean they are authorized only to use personal information in order to provide the services or to perform the functions required by us.

We will disclose personal information if we are under legal obligation (court order, required by legislation), or if an authorized request is made from a law enforcement agency.

Otherwise, we will only disclose personal information with the consent of the relevant individuals. For example, if you are a member, *with your consent (and only with your consent)*:

-we may provide personal information to HGC's personal trainers to assist you in improving your fitness level and well being, and so they can advise you which fitness programs are suitable for you. If personal trainers are contractors (rather than HGC employees), their contracts with us require them to keep your personal information confidential. Of course, all of our employees are required to keep your personal information confidential also; and

-we may disclose personal information to our business partners so that they may contact you directly with special offers, discounts or other membership benefits.

4) How can I access my personal information?

Privacy laws give you rights to seek access to the personal information we hold about you. You can seek access by completing a member inquiry form at your home club's reception desk, or by writing our corporate office (see section 8). Members can also make changes to their personal information through logging into the member services module online. Generally, we should be able to provide you access within 30 days of your request.

We try to ensure that all the personal information that we hold about you is accurate, complete and up-to-date. However, we rely on you to help us with this.

5) Is my personal information kept secure?

HGC takes reasonable steps to ensure that the personal information we hold is stored in a secure environment protected from unauthorized access, modification or disclosure. We remind our staff and

contractors of the importance of storing personal information in a secure way, and to treat it as confidential information.

6) Anonymity

HGC only offers its services to members, and it is not possible to become a member of HGC without first providing HGC with the personal information that is requested in our application form and our pre-exercise waivers. We may be able to answer telephone questions without collecting personal information from you, but if you would like to use our clubs, we need your personal information.

7) Website/online privacy

As we collect personal information through www.hamptongymcorp.com and our member services module, this privacy policy also outlines our approach to online privacy issues. In that context, it is to be read as forming part of the terms of use for our website.

a)Cookies

When you visit our website online, we will not collect any personal information unless you chose to provide it to us (ie. Sending us e-mails through our website. However, we may collect certain data that does not identify you ("web log info) when you visit certain pages, such as the browser and operating system you have. We may also use "cookies" which are small files that are stored on your computer that manage the security and navigation process of the site. You can choose to block these cookies but some portions of the site may not function correctly if you do. This type of data is collected for statistical purposes only, and while cookies may identify your computer, they are unlikely to identify you personally.

b)Email/SMS marketing

We will not email or SMS you marketing unless you have consented to this. Further, you can unsubscribe from our newsletter or other bulletins by using the "unsubscribe" facility contained in each electronic publication we send.

c)site security

Our website used up to date technology to maximize the security of your personal information.

8)Contact details and other information

If you have any queries or concerns about privacy or this privacy policy, you can either provide a written request or complaint at one of our clubs, or you can contact our corporate office as follows;

-by letter- Privacy Officer, Hamptons Gym Corporation, PO Box 3237, Sag Harbor NY 11963.

-by telephone- 1-866-96-BULLDOG

-by email- inquiries@hamptongymcorp.com

This privacy policy applies to HGC, its employees and its contractors. HGC may change its privacy policy at any time. This policy was last updated 07/09.