

1. BACKGROUND

This Privacy Policy describes the ways in which Revo Fitness processes and protects your personal information and data. In this policy, all references to “we” or “us” refers to Fettle Group Pty Ltd (ACN 648 441 258) and its related bodies corporate.

We value your privacy and are committed to safeguarding your personal information which we receive in connection with our business operations. To achieve this commitment to privacy, we comply with the Australian Privacy Principles and the Notifiable Data Breach Scheme contained in the *Privacy Act 1988* (Cth). This legislation governs the way we collect, use, disclose and store your personal information and how we notify you in circumstances where your information is lost or accessed. For further information regarding Australia's privacy legislation, please refer to the Office of the Australian Information Commissioner:

- (a) online at www.oaic.gov.au;
- (b) by email at enquiries@oaic.gov.au; or
- (c) by telephone on 1300 363 992.

If you do not feel comfortable with any aspect of this Privacy Policy or do not agree to the terms of this Privacy Policy, please immediately leave the website, discontinue the use of our services and email us at privacy@revofitness.com.au.

2. INFORMATION WE COLLECT

We collect information about you in order to provide you with our services. You may choose whether to provide us with this information, however your choices may affect our ability to offer you part or all of our services.

We may also collect and hold 'sensitive information' about you, including your health information and, where we use facial recognition technology, your biometric information, as discussed further below. We only collect sensitive information about you with your consent, or otherwise in accordance with the Australian Privacy Principles

We will collect personal information about you directly from you, except where it is unreasonable or impracticable for us to do so. We may collect personal information from sources such as:

- (a) **Registration Information:** when you register with us, you provide information including your name, date of birth, gender, email address, contact information, emergency contact details, credit card, debit card or bank account details and any other information which you may provide us. All payment information is stored and processed by third parties and is handled in accordance with their privacy policy and practices.
- (b) **Communication Information:** when you communicate with us via telephone, email, SMS, social media, through our mobile application or online we will collect your contact information and any other information you choose to provide to us.
- (c) **Commercial Information:** when you purchase goods or services from us, we will collect a record of these purchases.
- (d) **Cookie Information:** we use cookies and similar tracking technologies on our website in order to track the use of our website and maintain and improve our services to you. Further information on cookie and online data collection is contained paragraph 3.

- (e) **Third Party Information:** whenever reasonable and practical to do so, we will collect personal information about you directly from you. However, in some cases we may be required to collect personal information about you from third parties such as your employer or from public sources. Where we collect information about you from a third party, we will take reasonable steps to ensure that you are made aware of the fact and circumstances of that collection. We may also receive information from third parties where you have authorised the third party to do so.
- (f) **Mobile Data Information:** you may access or use our services via a mobile device or application. We may collect information about you and your device, such as your IP address, location or device information, and any other information provided by your mobile device. If you do not want us to collect your location information you can disable the GPS or location-tracking function of your device.
- (g) **Third-party plugin Information:** in some cases, we may have integrated a third-party plugin into our website or mobile application. The use of such third-party plugins may result in data collection by both us and the relevant third party. We do not control the information you share with third parties via these plugins. You should refer to the third party's privacy statement to understand their data handling practices.
- (h) **Surveillance Information:** when you access our facilities, your image is likely to be captured by surveillance systems, including CCTV, installed for member and staff safety, security, the prevention, detection and investigation of unlawful, violent, threatening or antisocial conduct, the enforcement of our membership terms and conditions and incident investigation. Surveillance information is accessible only to authorised personnel and service providers who require access for those purposes and is retained only for as long as reasonably necessary for those purposes or as required by law.
- (i) **Biometric information:** we may use facial recognition technology at some of our clubs. Where facial recognition technology is implemented, biometric data may be used to identify individuals involved in any incident, including safety incidents, breaches of membership terms, violent, threatening, abusive or unlawful conduct at our clubs, or whose membership or access rights have been suspended, terminated or otherwise restricted. Further information on the collection of your biometric information is contained paragraph 4.

We may collect information from third parties including parents or guardians of underage members, your personal trainer, debit and payment service providers who process transactions on our behalf, public sources, our social media platforms and your employer with whom we may have negotiated a corporate partnership.

Where we collect personal information about a person under the age of 18, we will take reasonable steps appropriate to the circumstances to obtain consent from their parent or guardian where required.

We will not collect or use identifiers assigned by the Government for our own file recording purposes, unless an exemption under the Privacy Act applies.

You may choose to deal with us anonymously or by using a pseudonym in certain circumstances, such as when you contact us to make a general enquiry. In most circumstances, however, at a minimum we need your name and contact details to allow us to handle your enquiry or request.

We may receive unsolicited personal information about individuals and, where we do, we will destroy or de-identify all unsolicited personal information that we could not have otherwise collected in accordance with the Australian Privacy Principles, unless the personal information is relevant to our purposes for collecting personal information.

3. WEBSITE USAGE

Our website uses "cookies" (small data files containing information about you that is stored on your hard drive), "embedded scripts" and other similar tracking technologies to collect information about your use of our website.

These tracking technologies are used to track your interaction with the website and target your interests to enhance your experience.

Information collected may include server addresses, top level domain names, the date, time and duration of a visit, website pages access and documents downloaded, referring and exit pages, whether you are a returning visitor, the type of browser used and the hardware type and operating system of the device used.

You may decline our cookies if your browser add-on permits but doing so may interfere with your use of our website and services. For more information on disabling cookies, refer to the 'Help' section of your browser.

4. BIOMETRIC INFORMATION

Biometric information is sensitive information. We may collect this information with your consent, which we will seek through signage displayed at the entrance to clubs where facial recognition technology is implemented and at the time you join or renew your membership, or where an exception under the *Privacy Act 1988* (Cth) applies.

Before deploying any facial recognition technology, we will take reasonable steps to ensure the technology operates accurately, test it for error, and review each match before any action is taken in reliance on it. A match alone will not result in action being taken against you without human review.

5. WHY WE COLLECT YOUR INFORMATION

We collect your personal information in order to carry out our business operations in the most professional and efficient manner possible. We use your information for the purpose for which it was collected. Some examples of why we collect your personal information include to:

- (a) provide our products and services to you.
- (b) to identify our users and potential users.
- (c) to interact with you, including by providing client support.
- (d) comply with legal obligations.
- (e) for insurance purposes.
- (f) to perform administrative and operational functions.
- (g) to advertise our services or the products and services of third parties, including delivering targeting materials to you regarding new services and offers.

- (h) compare information provided by you for accuracy and verify it with third parties where appropriate.
- (i) enable third party service providers to provide us and our related companies with services including but not limited to information technology, auditing, and legal advice.
- (j) to enable you to use our website and the Revo Fitness mobile application (Mobile App).
- (k) enable debit and payment service providers who process transactions on our behalf to collect fees and payments owing to us.
- (l) to develop consumer insights so we can better understand your preferences and interests, personalise your experience and enhance the products and services you receive.
- (m) our commercial partners with whom we partner to organise discounts or other promotions for you.
- (n) for security, credit or fraud prevention purposes.
- (o) for any other purpose identified in an agreement between you and us.
- (p) to operate facial recognition technology at our clubs for the safety and security of our members, staff and visitors and to prevent, detect and investigate incidents.
- (q) to enforce our membership terms and conditions and club rules.

Where your personal information is not 'sensitive information' (information regarding your health and racial or ethnic origin or biometric information) we may use your information for reasonably expected secondary purposes related to the above.

In addition, we may use your information as otherwise authorised by law.

6. INFORMATION WE DISCLOSE

We may transfer or disclose your personal information to our related companies or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors. We will only disclose your information to others outside our group of companies to the extent permitted by the Australian Privacy Principles and required to provide our services to you, for the purposes outlined in paragraph 5 or as otherwise requested or authorised, and subject to appropriate safeguards requiring those recipients to protect your personal information and use it only for the purpose for which it was disclosed.

Our Mobile App is a third-party application which is operated by EGYM, Inc (**EGYM**). The collection of personal information by the Mobile App is subject to the privacy policy of EGYM. We encourage our members who use the Mobile App to read EGYM's privacy policy.

If the ownership or control of all or part of our business changes, we may transfer your personal information to the new owner.

Unless you have given your consent, we will not rent or sell your information to third parties except as set out in this Privacy Policy.



7. DISCLOSURES TO ENFORCEMENT BODIES

We may disclose your personal information, including CCTV and other surveillance footage and images, facial recognition match records, your membership, identity and contact details, access and attendance records and incident reports, to the police or another enforcement body where:

- (a) we reasonably believe the disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, that body, including in response to a reasonable request from police in relation to an active investigation;
- (b) the disclosure is required or authorised by or under an Australian law or a court or tribunal order, including in response to a warrant, subpoena or statutory notice; or
- (c) another exception under the *Privacy Act 1988* (Cth) applies, including where we reasonably believe the disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of any individual or to public health or safety.

We assess each request on its merits. Other than where urgency makes it impracticable to do so, we require the request to be made in writing by an authorised officer and to identify the investigation or enforcement related activity concerned and the information sought. We disclose only the personal information that is reasonably necessary to respond to the request, and we make a written note of each use or disclosure we make on the ground that it is reasonably necessary for an enforcement related activity, as required by the Australian Privacy Principles.

8. DISCLOSING YOUR PERSONAL INFORMATION OVERSEAS

From time to time we may engage an overseas recipient to provide services to us, such as our Mobile App provider who is based in Germany.

We will not send your personal information to recipients outside of Australia without first:

- (a) taking reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles and this Privacy Policy;
- (b) obtaining your consent; or
- (c) otherwise complying with the Privacy Act.

By providing us with your personal information, you consent to the storage of such information on overseas servers.

9. HOW WE HANDLE INFORMATION

We take reasonable steps to protect personal information held by us from misuse, loss or unauthorised access, modification or disclosure.

Personal information we collect and hold is stored on secure servers and is only accessible by those persons who need access to the information or in order to carry out our services. We also maintain physical security measures to protect the use and storage of physical records containing your personal information. Our staff are subject to confidentiality agreements which require them not to disclose your information otherwise than in accordance with this Privacy Policy.

We will take reasonable steps to destroy or de-identify your personal information when we are no longer permitted to keep it.

Where we detect misuse, loss or unauthorised access, modification or disclosure of your personal information, we will comply with all relevant provisions of the Notifiable Data Breach Scheme.

10. DIRECT MARKETING:

We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

Provided that you have not unsubscribed or otherwise opted out, we may use your information for direct marketing:

- (a) where you have agreed to receive direct marketing from us; or
- (b) where you have engaged with us directly, and we believe that you would reasonably expect to receive direct marketing from us.

We may utilise the services of third parties to assist us with undertaking our direct marketing activities. We will not otherwise disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

Note that if you opt-out of direct marketing messages from us, we may still communicate with you from time to time for other purposes, including where we:

- (a) respond to any correspondence you send us;
- (b) provide you with invoices or updates in respect of any orders you have placed with us;
- (c) engage with our contractors and suppliers; or
- (d) are legally or contractually required to provide you with notice of certain matters.

2. MEMBER BENEFITS PROGRAMS

We may enter into corporate partnerships with third parties who are seeking to offer discounted products or services to our members. Where you apply for discounted products or services through such third parties, you consent for your member information being provided to those third parties to confirm your eligibility for discounts and consent to receiving any relevant promotional material.

3. ARTIFICIAL INTELLIGENCE

We use enterprise artificial intelligence tools, including tools provided to us by third parties, to assist us in operating our business. Personal information you provide to us, and personal information we collect about you, may be accessed and processed by those tools.

We only use enterprise artificial intelligence tools that are made available to us under contractual arrangements which require the provider to keep your personal information confidential, to use it only to provide the service to us, and which prohibit the provider from using your personal information to train or improve its own models. Access to these tools is restricted to authorised personnel who require access to perform their duties. Any unsolicited information that you provide to us you consent to being processed by our enterprise artificial intelligence tools, including sensitive information. Where a tool is hosted or supported outside Australia, we handle that disclosure in accordance with paragraph 8.



Output generated by our enterprise artificial intelligence tools is reviewed by an appropriately trained member of our team before it is used or relied upon to make a decision about you, to communicate with you or to take action affecting you. That person has the authority and the practical ability to reject, correct or override the output.

4. AUTOMATED DECISION MAKING

Some of our systems may use computer programs to make, or to substantially and directly assist in making, decisions about you. The kinds of personal information used in those programs include your identity and contact details, date of birth, membership and access records, attendance and club usage information, payment and billing history, communications with us, incident and surveillance records and, where facial recognition technology is used, biometric information. The kinds of decisions those programs make, or substantially and directly assist in making, include:

- (a) whether to grant, suspend, restrict or terminate your access to a club or to your membership, including where a facial recognition match is generated or a breach of our membership terms and conditions is identified;
- (b) whether a transaction, payment or account activity is flagged as potentially fraudulent or as presenting a credit or payment risk;
- (c) whether to refer an incident to our security personnel, management or the police; and
- (d) what products, services, offers and communications are made available or directed to you.

If you would like to know more about how a decision about you was made, or would like a decision reviewed, please contact our Privacy Officer at privacy@revofitness.com.au.

5. YOUR RIGHTS & CHOICES

You are entitled to access the personal information we hold about you and may request that we correct any errors in the information we hold.

If you would like to access or correct your personal information held by us, withdraw a consent you have provided, or request deletion or de-identification of personal information that we are no longer required or permitted by law to retain, please contact us at the address below. Withdrawal of consent will not affect processing that occurred before the withdrawal and may affect our ability to provide some services to you.

We will take reasonable steps to allow you to access your information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material). We will correct your personal information where we are satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If we correct any personal information that we have disclosed to third parties and you request us to do so then we will take reasonable steps to notify those parties of the change or update. You accept that following a request to correct your information we may be required to take reasonable steps to verify your identity or the personal information, which may include confirmation with third parties.

We will respond to all requests to access or correct personal information within a reasonable time. On the rare occasions

when we refuse access to or correction of personal information, we will provide you with a written notice stating the reasons why we did so.

6. THIRD PARTY PROVIDERS

Some services associated with your membership are provided by third party providers, such as:

- (a) payment services, which are provided by Ezypay Pty Ltd (**Ezypay**), pursuant to the direct debit agreement entered into with Ezypay when you signed up for your membership; and
- (b) body scan services, which are provided by Evolt IOH Pty Ltd (**Evolt**) pursuant to terms and conditions agreed when you use the Evolt body scanner.

The collection, storage and processing of personal information (including sensitive information) by these third-party providers is handled in accordance with each of those providers' privacy policy and practices and we encourage our members who use these third-party services to read their privacy policies.

7. LINKS TO OTHER WEBSITES

Our website may from time to time contain links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that we are not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy policies of each and every website that collects personal information.

8. HOW TO CONTACT US

If you have any queries, concerns or complaints, or would like to discuss any matter concerning your privacy, please contact us at privacy@revofitness.com.au.

If you are concerned that we may have breached the Australian Privacy Principles, please contact us immediately. We will undertake a reasonable and expeditious assessment of the concern and suggest relevant resolution processes. Alternatively, you may wish to contact the Office of the Australian Information Commissioner.

9. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. Any changes to this Policy will be effective immediately upon the posting of the revised Privacy Policy on www.revofitness.com.au/policies. Where changes are material, we will take reasonable steps to notify you, including by email or through the Mobile App. We encourage you to periodically review www.revofitness.com.au/policies for the latest information on our privacy practices.

The effective date of this Privacy Policy is: **14 October 2026**.

