

PRIVACY POLICY

Tuli Sauna and Plunge, LLC understands that you care about how information about you is collected, used, and shared, and we appreciate that you trust this information with us. We take your privacy very seriously and are committed to protecting your information. We act in accordance with applicable data protection and privacy laws when collecting and using information about you.

Please read this privacy policy carefully as it contains important information on who we are, how and why we collect, store, use, and share your personal information. It also explains your rights in relation to your personal information and how to contact us in the event you have a complaint.

This Privacy Policy ("Privacy Policy") applies to your use of our website (collectively, "Site") and describes what kind of information we collect, when and how we might use that information, how we protect the information, and the choices you have with respect to your personal information. Tuli Sauna and Plunge, LLC may change, add to, or remove all or any portion of this Privacy Policy at any time, and will post the current Privacy Policy so that you will always have the current Privacy Policy available to you.

Should you have any comments or questions about how we collect and use your personal information, please reach out via email to hello@tulisaunaandplunge.com.

1. **Applicability & Eligibility.** This Privacy Policy applies to this Site, and our collection, use, disclosure, and protection of your data. It does not apply to third-party websites, applications, or services. Before accessing, using, or interacting with the Site, you should carefully review the terms and conditions of this Privacy Policy.

By using this Site, you are agreeing to our Privacy Policy, without modification, and confirming you have read and understand these policies, including how and why Tuli Sauna and Plunge, LLC uses your information. If you do not want us to collect or process your personal information in the ways described in this Privacy Policy, you should not use the Site.

This Site is not intended for individuals under the age of 18. We do not knowingly collect personal information directly from individuals under 18 years of age. Our services are not intended for individuals under 18 years of age. If you are under 18 years of age, you should not submit or post personal information on our Site.

1. **Key Terms.** It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Tuli Sauna and Plunge, LLC
Personal information	Any information relating to an identified or identifiable individual

2. **Personal Information Collection and Use.** We collect information about you and your use of this Site through various means, including information we receive from you on Site forms, as well as through your access, use, or interaction with this Site. Such processing is utilized to provide this Site to visitors.

Please do not submit any confidential, proprietary, or sensitive personally identifiable information (e.g., Social Security Number, Driver's License Number, Credit Card Number, Bank Account Number or other financial information) to us through this Site. We are not liable or responsible for any consequences resulting from the submission of this personally identifiable information through this Site. If you do submit this information, you do so at your own risk.

Where we gather your information using consent, your opt-in consent will be clearly obtained. You may withdraw this consent at any time by contacting us at hello@tulisaunaandplunge.com.

3. **Personal Information We Collect About You.** We may collect and use the following personal information that identifies, relates to, describes, is reasonable capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Categories of Personal Information	Specific Types of Personal Information Collected
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Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers)	Name, postal address, Internet Protocol address, email address
Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Name, postal address, bank account number, debit card number, credit card number, education, employment history, employment, email address,
Characteristics of protected classifications under California or federal law.	We do not collect.
Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies)	Products or services purchased, obtained, or considered
Biometric information	We do not collect.
Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement)	The information we collect could be aggregate and/or user-specific individual information but does not reveal your specific identity (like your name and/or contact information). This information is primarily needed to maintain the security and operation of our Site and for internal analytics and reporting purposes. This information includes device characteristics (including operating system and name), your IP address, browser characteristics, communication data, referring URLs (what web websites or search terms that referred you to the Site), how and when you use our and other technical information, time zone, location, country, language preferences and patterns of use (information on the individual web pages or services you view on our Site, and browsing and navigation patterns within our Site).
Geolocation data	We do not collect
Audio, electronic, visual, thermal, olfactory, or similar information	We do not collect
Professional or employment-related information	Employment history as contained in a job application or resume
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA)	Education history as contained in a job application or resume
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	We do not collect.

This personal information is required to provide products and/or services to you. If you do not provide personal information we ask for, it may delay or prevent us from providing products and/or services to you.

2. **How Your Personal Information is Collected.** We collect most of this personal information directly from you—in person, by telephone, text, email, and/or via our Site. However, we may also collect information:
- From publicly accessible sources (e.g., property records);
 - Directly from a third party (e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers);
 - From a third party with your consent (e.g., your bank);
 - From cookies on our Site;
 - Google Analytics*; and
 - Via our IT systems, including automated monitoring of our Site and other technical systems, such as our computer networks and connections, communications systems, email and instant messaging systems.

* Google Analytics uses persistent cookies to allow Tuli Sauna and Plunge, LLC to see behavior information relating to visitor age, gender, and interests. Tuli Sauna and Plunge, LLC may also use this data to create remarketing lists. You can opt out of Google Analytics without affecting how you visit this Site. For more information on opting out of Google Analytics tracking and customizing Google Display Network ads, visit Google's [Ad Settings](#).

3. **How and Why We Use Your Personal Information.** Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.,:
- To comply with our legal and regulatory obligations;
 - For the performance of our contract with you or to take steps at your request before entering into a contract;
 - For our legitimate interests or those of a third party; or
 - Where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

What we use your personal information for	Our reasons
To provide products and/or services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or Tuli Sauna and Plunge, LLC	For our legitimate interests or those of a third party, i.e., to minimize fraud that could be damaging for us and for you
Conducting checks to identify our customers and verify their identity Screening for financial and other sanctions or embargoes Other processing necessary to comply with professional, legal, and regulatory obligations that apply to our business, e.g., under health and safety regulation or rules issued by our professional regulator	To comply with our legal and regulatory obligations
Gathering and providing information required by or relating to audits, inquiries, or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring business policies are adhered to, e.g., policies covering security and internet use	For our legitimate interests or those of a third party, i.e., to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training, and quality control	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price

Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e., to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, product and/or service range or other efficiency measures	For our legitimate interests or those of a third party, i.e., to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorized access and modifications to systems	For our legitimate interests or those of a third party, i.e., to prevent and detect criminal activity that could be damaging for us and for you To comply with our legal and regulatory obligations
Updating and enhancing customer records	For the performance of our contract with you or to take steps at your request before entering into a contract To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, e.g., to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: - existing and former customers; - third parties who have previously expressed an interest in our services; - third parties with whom we have had no previous dealings.	For our legitimate interests or those of a third party, i.e., to promote our business to existing and former customers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e., to ensure our customers are likely to be able to pay for our products and services
External audits and quality checks, e.g., for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or those of a third party, i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal information, which we will only process with your explicit consent.

- 4. Do Not Track.** Most web browsers and some mobile operating systems and mobile applications include a “do not track” feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored or collected. Our web services do not alter, change, or respond upon receiving Do Not Track (DNT) requests or signals in browsers. As described in more detail above, we track user activity using cookies and similar technologies

4. **Promotional Communications.** We may use your personal information to send you updates (by email, text message, telephone, or post) about our products and/or services, including exclusive offers, promotions, or new products and/or services.

We have a legitimate interest in processing your personal information for promotional purposes (see above “How and why we use your personal information”). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never sell or share it with other organizations outside the Tuli Sauna and Plunge, LLC group for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- Contacting us at hello@tulisaunaandplunge.com;
- Using the “unsubscribe” link in emails or “STOP” number in texts.

We may ask you to confirm or update your marketing preferences if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

5. **Who We Share Your Personal Information With.** We routinely share personal information with:
- Business partners – These are businesses that we work with to offer you certain services or promotions.
 - Non-affiliated service providers – These non-affiliated service providers may offer services like, but not limited to, payment processing, data analysis, email delivery, hosting services, customer service, marketing efforts, etc. These companies may use information about your visits to this Site and other websites that are contained in cookies to provide services, advertisements, or to collect data about how you interact with this Site over time
 - Affiliates – If we shares your information with affiliates, they are required to adhere to this Privacy Policy.
 - Government and regulatory authorities – We may provide information to government and regulatory bodies to provide the services you have purchased or because of legal and regulatory obligations on our business.
 - Auditors and financial and legal advisors – We may need to provide information to assist with provision of services or management of our business.
 - Relevant industry self-regulatory bodies – We may need to provide information to assist with provision of services or management of our business.
 - Others only as permitted by law

We only allow our service providers to handle your personal information if we are satisfied, they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. We will typically anonymize information, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We do not sell your personal information, and we have contracts with service providers to prohibit any sale of your personal information and to provide written assurances regarding the security and privacy protections they have in place to protect your personal information.

6. **Personal Information We Sold or Disclosed for a Business Purpose.** In the preceding 12 months, we have sold to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:
- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers);
 - Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state

identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;

- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Biometric information;
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information;
- Professional or employment-related information;
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA); and
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

In the preceding 12 months, we have disclosed for a business purpose to one or more third parties the following categories of personal information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

- Identifiers (e.g., a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers);
- Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information;
- Characteristics of protected classifications under California or federal law;
- Commercial information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies);
- Biometric information;
- Internet or other electronic network activity information (e.g., browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement);
- Geolocation data;
- Audio, electronic, visual, thermal, olfactory, or similar information;
- Professional or employment-related information;
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (FERPA); and
- Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

7. **Where Your Personal Information is Held.** Information may be held at our offices and those of our third-party agencies, service providers, representatives and agents as described above (see above: "Who We Share Your Personal Information with").

8. **How Long Your Personal Information Will Be Kept.** We will keep your personal information while you have an account with us or while we are providing products and/or services to you. Thereafter, we will keep your personal information for as long as is necessary:

- To respond to any questions, complaints or claims made by you or on your behalf;
- To show that we treated you fairly; or
- To keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, we will delete or anonymize it.

9. **Important Notice to Users Outside the U.S.** The Site and the services are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us will be transferred to the United States. By providing us with any information through the Site or the services, you consent to this transfer.
10. **Your Rights Under the CCPA.** You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to exercise free of charge:

Disclosure of Personal Information We Collect About You	You have the right to know: • The categories of personal information we have collected about you; • The categories of sources from which the personal information is collected; • Our business or commercial purpose for collecting or selling personal information; • The categories of third parties with whom we share personal information, if any; and • The specific pieces of personal information we have collected about you. • Please note that we are not required to: • Retain any personal information about you that was collected for a single one-time transaction if, in the ordinary course of business, that information about you is not retained; • Reidentify or otherwise link any data that, in the ordinary course of business, is not maintained in a manner that would be considered personal information; or • Provide the personal information to you more than twice in a 12-month period.
Personal Information Sold or Used for a Business Purpose	In connection with any personal information we may sell or disclose to a third party for a business purpose, you have the right to know: The categories of personal information about you that we sold and the categories of third parties to whom the personal information was sold; and The categories of personal information that we disclosed about you for a business purpose. You have the right under the California Consumer Privacy Act of 2018 (CCPA) and certain other privacy and data protection laws, as applicable, to opt-out of the sale or disclosure of your personal information. If you exercise your right to opt-out of the sale or disclosure of your personal information, we will refrain from selling your personal information, unless you subsequently provide express authorization for the sale of your personal information. To opt-out of the sale or disclosure of your personal information, please email hello@tulisaunaandplunge.com.
Right to Deletion	Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

	• Delete your personal information from our records; and • Direct any service providers to delete your personal information from their records. • Please note that we may not delete your personal information if it is necessary to: • Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us; • Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity; • Debug to identify and repair errors that impair existing intended functionality; • Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law; • Comply with the California Electronic Communications Privacy Act; • Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent; • Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; • Comply with an existing legal obligation; or • Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.
Protection Against Discrimination	You have the right to not be discriminated against by us because you exercised any of your rights under the CCPA. This means we cannot, among other things: • Deny goods or services to you; • Charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; • Provide a different level or quality of goods or services to you; or

	Suggest that you receive a different price or rate for goods or services or a different level or quality of goods or services. Please note that we may charge a different price or rate or provide a different level or quality of goods and/or services to you, if that difference is reasonably related to the value provided to our business by your personal information.
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11. **Keeping Your Personal Information Secure.** We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.
12. **How to Exercise Your Rights.** If you would like to exercise any of your rights as described in this Privacy Policy, please:
- Email us at hello@tulisaunaandplunge.com.

Please note that you may only make a CCPA-related data access or data portability disclosure request twice within a 12-month period.

If you choose to contact directly by email, you will need to provide us with:

- Enough information to identify you (e.g., your full name, address and customer or matter reference number));
- Proof of your identity and address (e.g., a copy of your driving license or passport and a recent utility or credit card bill); and
- A description of what right you want to exercise and the information to which your request relates.

We are not obligated to make a data access or data portability disclosure if we cannot verify that the person making the request is the person about whom we collected information or is someone authorized to act on such person's behalf.

Any personal information we collect from you to verify your identity in connection with your request will be used solely for the purposes of verification.

5. **Linking to Third Parties.** When you leave this Site and go to another linked website, we are not responsible for the content or availability of the linked website. Please be advised that if you enter into a transaction on the third-party website, we do not represent either the third party or you. Further, the privacy and security policies of the linked website may differ from those practiced by us.
13. **Changes to This Privacy Notice.** This privacy notice was published on September 1, 2025 and last updated on September 1, 2025. We reserve the right to change this Privacy Policy at any time in our sole discretion. If we makes changes, we will post the revised policy here. By continuing to use our Site and services after notice is provided, you accept and agree to this Privacy Policy as modified.
14. **How to Contact Us.** Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.
15. Our contact details are shown below:

Tuli Sauna and Plunge, LLC
1214 S. Whitney Way
Madison, WI 53711
hello@tulisaunaandplunge.com
+1 (262) 685-7724

16. **Do You Need Extra Help?** If you would like this notice in another format (for example: audio, large print) please contact us (see "How to contact us" above).

