# **REAL COLLABORATIVE PRIVACY POLICY**

# Last Updated: June 2, 2021

Real Collaborative, Inc., doing business as "Real," ("Real," "we," "our," and/or "us") value the privacy of individuals who use our websites and related services (collectively, our "Services"). This privacy policy (the "Privacy Policy") explains how we collect, use, and share information from users of our Services ("Users"). By using our Services, you agree to the collection, use, disclosure, and procedures this Privacy Policy describes. Beyond the Privacy Policy, your use of our Services is also subject to our Terms of Service (<u>https://www.join-real.com/terms-of-service</u>).

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Please note that Real's Services are intended for general wellness purposes only. Real does not provide professional advice, including medical advice or care.

If you or someone you know may be considering suicide, contact the <u>National Suicide Prevention</u> <u>Lifeline</u> at 1-800-273-8255 (en español: 1-888-628-9454; deaf and hard of hearing: dial 711, then 1-800-273-8255) or the Crisis Text Line by texting HOME to 741741.

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### **Information We Collect**

We may collect a variety of information from or about you or your devices from various sources, as described below.

# A. Information You Provide to Us.

**Registration Information**. When you register to use our Services, we ask you for your name, email address, zip code, phone number, birthday, gender. We also ask you to complete certain questionnaires about your general state of well-being, which will help us tailor our Services to you. Optionally, you can choose to provide us with your address, as well. We also ask how you heard about us and why you are interested in the Services. If you sign up for notifications or updates or participate in our surveys without registering for our Services, we will ask for your name and email.

Information You Provide When Using Our Services. Depending on which Services you choose to access, we may ask you specific questions that are relevant to those Services. For example, if you choose a Pathway that has a pregnancy theme, we may ask you if you are pregnant, among other things. This information helps us better provide you with the Services. If you sign up for a Roundtable, you will view these Services "synchronously," meaning in real time, with other Users and a presenting therapist. If you select to enroll in a Pathway subscription, you will engage in these Services "asynchronously," meaning you will be able to view pre-recorded or streaming sessions and will not engage real-time with any content or other Users. Roundtables and Pathways are not individual therapy and are intended solely to present generalized subject matter on the

**topic.** When engaging with the Services, you may choose to complete journal entries, and can pose questions or comments in the Roundtable that will be visible to other Users participating in the Roundtable and the presenter. Your username, which you will select, will be visible to other Users when you participate in a Roundtable.

**Communications**. If you contact us directly, we may receive additional information about you. For example, when you contact our customer support team, we will receive your name, email address, phone number, the contents of a message or attachments that you may send to us, and other information you choose to provide. If you subscribe to our newsletter, then we will collect certain information from you, such as your email address. When we send you emails, we may track whether you open them to learn how to deliver a better customer experience and improve our Services.

**Careers.** If you decide to apply for a job with us, you may submit your contact information and your resume online. We will collect the information you choose to provide on your resume, such as your education and employment experience. It may also be possible to apply through LinkedIn. If you do so, we will collect the information you make available to us on LinkedIn.

**Payment Information.** If you make a purchase through our Services, your payment-related information, such as credit card or other financial information, is collected by our third-party payment processor on our behalf.

### B. Information We Collect When You Use Our Services.

**Location Information**. When you use our Services, we infer your general location information, for example by using your internet protocol (IP) address.

**Device Information**. We receive information about the device and software you use to access our Services, including IP address, web browser type, operating system version, phone carrier and manufacturer, application installations and device identifiers.

**Usage Information**. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, and the dates and times of your visits.

**Information from Cookies and Similar Technologies.** We and third-party partners collect information using cookies, pixel tags, or similar technologies. Our third-party partners, such as analytics and advertising partners, may use these technologies to collect information about your online activities over time and across different services. Cookies are small text files containing a string of alphanumeric characters. We may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser on subsequent visits to our Services.

Please review your web browser's "Help" file to learn the proper way to modify your cookie

settings. Please note that if you delete or choose not to accept cookies from the Service, you may not be able to utilize the features of the Service to their fullest potential.

Audio/Video Information. For some of our Services, we work with a third-party partner to facilitate internet videoconference between you and the therapist providing the Service. We receive information about these communications, such as the date and time of the internet videoconference, who attended, the duration of the video conference and a transcript of the chat. We may also record webinar events, such as speaking events, that are not Roundtables ("Events"), but only the audio and video of the speaker will be recorded. We do not otherwise record or receive a recording of the videoconference (either video or audio), and direct others using the Services not to record through our TOS. However, it is possible a User could violate this policy and record the videoconference through a secondary means, such as an iPhone video. It is also possible that your videoconference could be viewed by others with access to the other users' device where the videoconference is being streamed.

**User Feedback.** We may ask you to voluntarily participate in a survey to rate and review our Services. If you voluntarily participate in our survey, we will not share a quote from your review without your permission. We may ask whether you permit us to use a quote from your survey on our website or other platforms where we advertise the Services.

# C. Information We Receive from Third Parties.

**Information from third party services.** If you choose to link our Services to a third-party account, we may receive information about you. If you wish to limit the information available to us, you should visit the privacy settings of your third-party accounts to learn about your options.

### How We Use the Information We Collect

We use the information we collect:

- To provide, maintain, improve, and enhance our Services, including scheduling the Services;
- To personalize your experience on our Service such as by providing tailored content and recommendations;
- To understand and analyze how you use our Services and develop new products, services, features, and functionality;
- To communicate with you, provide you with updates and other information relating to our Services, provide information that you request, respond to comments and questions, and otherwise provide customer support;
- To facilitate the connection of third-party services or applications, such as social videoconferencing and scheduling appointments;
- For marketing purposes if you complete our voluntary survey;
- To facilitate transactions and payments;

- To find and prevent fraud, and respond to trust and safety issues that may arise;
- For compliance purposes, including enforcing our TOS or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency; and
- For other purposes for which we provide specific notice at the time the information is collected.

# How We Share the Information We Collect

**Affiliates.** We may share any information we receive with our affiliates (if any) for any of the purposes described in this Privacy Policy.

**Vendors and Service Providers.** We may share any information we receive with vendors and service providers retained in connection with the provision of our Services.

**Marketing.** We do not rent, sell, or share information about you with nonaffiliated companies for their direct marketing purposes, unless we have your permission.

Analytics Partners. We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources You can learn more about Google's practices by visiting <a href="https://www.google.com/policies/privacy/partners/">https://www.google.com/policies/privacy/partners/</a>. To help us understand how you use our Services and to help us improve them, we automatically receive information about your interactions with our Services, like the pages or other content you view, the searches you conduct, people you follow, purchases you make, your comments, any content you post, and the dates and times of your visits.

**Sharing Between Users**. When you use the Services, the information you are able to share with other Users is limited. When you participate in a Roundtable, you may share questions and comments that will be visible to the group, and may participate via audio. Your username, which you will select, will be visible to other Users in your Roundtable. If you choose to turn on your camera during a Roundtable, other Users will also be able to see your video image.

As Required By Law and Similar Disclosures. We may access, preserve, and disclose your information if we believe doing so is required or appropriate to: (a) comply with law enforcement requests and legal process, such as a court order or subpoena; (b) respond to your requests; or (c) protect your, our, or others' rights, property, or safety. For the avoidance of doubt, the disclosure of your information may occur if you post any objectionable content on or through the Services.

**Merger, Sale, or Other Asset Transfers.** We may transfer your information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. The

use of your information following any of these events will be governed by the provisions of this Privacy Policy in effect at the time the applicable information was collected.

**Consent.** We may also disclose your information with your permission.

# **Your Choices**

**Marketing Communications.** You can unsubscribe from our promotional emails via the link provided in the emails. Even if you opt-out of receiving promotional messages from us, you will continue to receive administrative messages from us.

# If you choose not to provide us with information we collect, some features of our Services may not work as intended.

# 1. Third Parties

Our Services may contain links to other websites, products, or services that we do not own or operate. We are not responsible for the privacy practices of these third parties. Please be aware that this Privacy Policy does not apply to your activities on these third-party services or any information you disclose to these third parties. We encourage you to read their privacy policies before providing any information to them.

### Security

We make reasonable efforts to protect your information by using physical and electronic safeguards designed to improve the security of the information we maintain. However, as no electronic transmission or storage of information can be entirely secure, we can make no guarantees as to the security or privacy of your information.

# **Children's Privacy**

2. You must acknowledge you are over 18 to use the Services. We do not knowingly collect, maintain, or use personal information from children under 13 years of age, and no part of our Services are directed to children. If you learn that a child has provided us with personal information in violation of this Privacy Policy, then you may alert us at <u>hi@join-real.com</u>.

### **International Visitors**

Our Services are hosted in the United States and intended for visitors located within the United States. If you choose to use the Services from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States for storage and processing. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Services. By providing any information, including personal information, on or to the Services, you consent to

such transfer, storage, and processing.

# **Update Your Information or Pose a Question**

You can update your account and profile information through your profile settings. If you have questions about your privacy on the Services or this privacy policy, please contact us at <u>hi@join-real.com</u>.

# **Changes to this Privacy Policy**

We will post any adjustments to the Privacy Policy on this page, and the revised version will be effective when it is posted. If we materially change the ways in which we use or share personal information previously collected from you through the Services, we will notify you through the Services, by email, or other communication.

### **Contact Information**

If you have any questions, comments, or concerns about our processing activities, please email us at hi@join-real.com.