

## **Our Privacy Notice**

Last Updated: August 28, 2023

Welcome to ibelong! We're delighted you have visited our website, and we take your privacy seriously.

This Privacy Notice ("Notice") describes how we (ibelong) may collect, use, process, store and disclose your Personal Data. When we reference "Personal Data" in this Notice, we mean information which individually identifies you, including members of your household, through contact information, such as your email address, phone number, physical address or name, or other identifiers as described below. We also describe your rights in connection with your Personal Data.

When you visit our website, ibelong.com or any one of our platforms, including applications ("Platform"), we may collect Your Personal Data. Depending on your inquiry or the activities on our Platform, we may also ask you about your interest in our services and other background information for you. However, please do not provide us with HIPAA-protected, medical or mental health information on our Platform.

We do not collect "sensitive information" on our Platform, including but not limited, religious preferences, social security or driver's license numbers.

In addition to communicating with you directly, we may send you information about our services via email or otherwise. You can stop receiving this information at any time by clicking on the unsubscribe link contained in the email message. However, if you request that we cease communicating with you completely, you will not have notice of or access to the full services we provide.

This Notice only relates to Personal Data that we collect on our Platform and does include information which we may collect from you while providing services to you through one-on-one coaching, during trainings or seminars, group sessions, or any written information that you provide to us outside the Platform.

In terms of gathering, storing and processing your Personal Data, we act as a controller and we are responsible for the Personal Data we process.

We do not knowingly collect Personal Data relating to anyone under the age of 18.

### **Information we collect about you**

As explained above, we may collect your contact information:

- 1) your full name or that of other members of your household, such as an emergency contact person (if you provide such information and if applicable);
- 2) contact information about you including your email, home address and phone numbers so that we can contact you by email, mail, phone and text message;
- 3) if you are participating in our services through your employer, we may request additional information from you such as your job title;

- 4) technical data including activity while on our Platform, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website; and,
- 5) We may also receive technical data about you through tracking technology such as cookies, as explained below.

### **How we use your Personal Data**

When you visit our Platform, we may use, process, and store your Personal Data and other data we collect to find out what interested you in our Services and our range of Service offerings. If the Services are provided to you through your employer, we may share your Personal Data with your employer. However, we do not share identifiable information with your employer in connection with responses to our surveys unless you provide enough information for your colleagues to ascertain who provided the response.

We do not “sell” your Personal Data to third parties, in the sense that we do not receive payment from those third parties, who intend to provide advertising or marketing to you.

We do “share” your Personal Data with third-party service providers who support our technology and services, including data security and storage companies.

It may be necessary for us to share your Personal Data to comply with applicable, protect our rights or the rights and safety of others, prevent a crime, in response to inquiries from government agencies such as law enforcement, or to comply with regulatory requirements.

We may process your Personal Data for other legal business purposes such as statistical analysis, aggregating data to help us improve our services or to better focus services that may interest you, improving security and to determine the number of visitors to our website as well as compliance with legal and regulatory guidelines.

We will only use your Personal Data for the purposes for which we collected it as described above or for reasons related to the original purpose.

### **Clients and Vendors**

If you are a Client, potential client or one of our vendors, we will use the Personal Data provided by your employees or contacts for communications with you and for invoicing. We may also offer your employees or contacts information about our services, including our marketing materials, as well as general marketing materials from which they have an option to opt out as described above.

### **Securing Your Personal Data**

We have adopted industry-standard security measures to reduce the risk that your Personal Data will be hacked or disclosed to unauthorized third parties. We have

procedures to address Personal Data breaches and we will notify you in accordance with applicable law.

### **Residents of Europe**

If you reside in Europe, and you visit our website we will take measures in accordance with GDPR to secure your Personal Data and reduce the risk of breach. If we transfer your Personal Data to recipients in locations with fewer protections, we will require those recipients to contractually commit to providing additional security measures.

We will use your Personal Data:

- (i) to fulfil our contractual obligations to you (GDPR Article 6(1)(b));
- (ii) when necessary for our legitimate and legally permissible interests (GDPR Article 6(1)(f));
- (iii) when it is necessary to comply with legal obligations (GDPR Article 6(1)(c)); and
- (iv) with your consent (GDPR Article 6(1)(a)).

### **Data Retention**

We retain your Personal Data for as long as we are providing services to you, to stay in contact with you even after we are no longer providing services to you subject to your rights to opt out of certain communications from us as described above.

### **Your rights regarding your Personal Data**

We respect to your rights to make a request to access your Personal Data at any time, or to request that we correct your Personal Data. However, you may only request how we use your Personal Data as frequently as required under applicable law. You will not be discriminated against compared with other visitors to our Platform for exercising your rights to your Personal Data.

You may also request that we remove or delete your Personal Data which we will do promptly (which may limit or terminate our ability to provide services to you). However, we have a right to retain your data for legal purposes, including any regulatory or agency requests, an ongoing investigation, a violation of our rights, or to prevent a crime.

### **Response Times and Additional Verification**

If you request access to your Personal Data, we may require additional information from you to confirm your identity. We will endeavor to respond to your request within 30 days. If your request is unusual or complicated, additional time may be required; and, we will keep you apprised of the turnaround time to respond to your request.

### **Tracking Technologies**

We use tracking technology, including cookies, to measure activities on our Platform, information requests and to improve your experience. If you decide to disable browser cookies, some aspects of our Platform may not function properly or be accessible.

## **Analytics**

We may use analytics in connection with your Personal Data services to gain insight into information obtained through our Platform, level of interest in our services, opportunities to improve the Platform. By providing us with your Personal Data, you consent to our usage of your Personal Data for this purpose.

## **Third-Party Sites**

To the extent our Platform may provide you with access to third-party sites, including third-party services, plug-ins and applications, those third parties may collect your Personal Data. You agree that we do not control such third parties' activities, and we are not responsible for how they use your Personal Data. If you are concerned about the activities of these third parties, we recommend that you review their privacy policies.

## **Questions and Comments**

You may contact us with any questions or concerns regarding our Privacy Policy via email: [hello@ibelong.com](mailto:hello@ibelong.com), or by phone: (707) 646-9193.

## **Updates to our Privacy Notice**

This Notice may be updated from time to time which will be visible on our Platform. Please check the last updated date; and, in the event of a material change in terms, we will send you notice of such changes.