



Last Updated: July 12, 2022

Change log: updated to include B2B contractual agreements

YourCoach knows you care about the collection and use of your information, so we created this Privacy Policy to describe how we collect, use, share and protect information you provide to us via our proprietary coaching platform (the “Platform”), which includes the YourCoach application (the “App”) and the YourCoach website located at www.yourcoach.health (the “Site”), and any *other information we collect when you call, email, or otherwise communicate with YourCoach Health Inc., d/b/a YourCoach Health (“YourCoach”, “we”, “us”)*.

This Privacy Policy describes:

- The types of information we collect from you
- How and why we collect your information
- Who we share your information with
- Your rights to your information
- How we protect your information

By accessing the Platform on any computer, mobile phone, tablet, or other device (collectively, “Device”), making a purchase from YourCoach, or otherwise interacting with YourCoach, you agree to the terms of this Privacy Policy.

If you do not agree to the terms of this Privacy Policy or our Terms of Service, please do not use the Platform. We may modify this Privacy Policy at any time, including as required to maintain compliance with rules and regulations, new technologies and security standards, and will post the current version on the Platform. We encourage you to periodically review our Privacy Policy to stay informed about how we use the information we collect. If we change the Privacy Policy in a material and retroactive manner, we will notify you.

Personal information we collect

We collect personal information from you when you submit it to us, including by: (1) registering on the Site or the App; (2) placing an order or purchasing a subscription; (3) signing up for our newsletter or marketing communications; (4) contacting us; or (5) participating in a promotion or survey. This information may include, for example, your name, gender, email address, mailing address, billing address, telephone number, date of birth, insurance information and payment method. We may combine the information we collect from you with information we receive about you from other sources, such as address update services. Because YourCoach offers its services directly to businesses, rather than to individual consumers or patients, any



personal information that we collect relates to your role as a representative of one of our business customers.

We use a third party payment processor to store your credit card information. They conduct the entire credit card transaction using industry standard encryption.

We may collect personal information from you when you write a review or comment on our Site or App. Additionally, we may collect information you provide (i) in the process of using the Platform, (ii) in connection with coaching sessions and message exchanges, all of which may be used by YourCoach for use in providing you the Platform and the services offered via the Platform, enhancing and improving YourCoach services and offering additional services or opportunities to coaches and end users, and conducting quality control, (iii) to help optimize and create health and wellness coaching programs, (iv) voice and video recording information for our quality assurance and service improvement purposes, subject to the requirements of applicable law, (v) via participation in studies or otherwise. We may also collect personal information of individual users of the Platform, with the consent of our customers, and subject to our customer's applicable Privacy Policy and Terms of Use.

In some jurisdictions, individuals may have the right to opt-in or withdraw consent for certain uses. If you reside in those jurisdictions, you may have additional rights, which are detailed in the Access, Correction, & Deletion section below.

Information we collect automatically

When you visit the Platform, we may collect certain information from you, including your IP address, browser type, operating system, device-identifying information, specific web pages visited during your connection, and the domain name from which you accessed the Platform. In addition, we may collect information about your browsing behavior, such as the date and time you visit the Platform, the areas or pages of the Platform that you visit, the amount of time you spend viewing the Platform, the number of times you return to the Platform and other clickstream data. We may also use non-personal or aggregated information for statistical analysis, research, and other purposes.

We analyze how visitors use our Platform through "cookie" technology. A cookie is a small text file that is placed on your computer when you access the Platform, and it allows us to recognize you each time you visit the Platform. We may use cookies to: (1) allow you to use the Platform without having to re-enter your user name and password; (2) enhance or personalize your Platform usage and experience; (3) monitor Platform usage; (4) manage the Platform; and (5) improve the Platform and our products and services, including providing you with interest-based ads. You can choose to set your browser to reject cookies or you can manually delete cookies on your computer by following your browser's help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have trouble accessing and using some of the pages and features currently on our Platform, or that may be added in the future.



We may also use web beacons on the Platform, in our emails, and in our advertisements on other websites. Web beacons are tiny graphic images that are used to collect information about your visit to the Platform, such as the pages you view and the features you use, as well as information about whether you open and/or act upon one of our emails or advertisements. We may also collect the URL of the website you visited immediately before coming to the App or the Site. Web beacons help us analyze our visitors' behavior and measure the effectiveness of the Platform and our advertising. We may work with service providers that help us track, collect and analyze this information. We may combine the information we collect through cookies and web beacons with other information we have collected from you or information from other sources.

Use of Information

We may use the information we collect from and about you: (1) to fulfill your requests for services and respond to your inquiries; (2) to match you with a Coach or a Client; (3) to inform you of services and promotions we believe might interest you; (4) to show you more relevant search results or customize your content; (5) to send you a confirmation email or information about the Platform; (6) to review Platform usage and operations; (7) to conduct data analysis, identify usage trends and develop new and/or improved services; (8) to address problems with the Platform, our business or our services; (9) to protect the security or integrity of the Platform and our business; (10) to monitor the Platform for compliance with our Terms of Service and the law; (11) to contact you with updates, newsletters and other informational and promotional materials from us and third party marketing offers from our trusted partners, as well as from other companies; and (12) to provide interest-based advertising to you based on the way you browse and use the Platform and other platforms.

If you sign up for our mailing list, we will send you informational emails about offers of services. You can 'unsubscribe' from our email list simply by clicking the 'unsubscribe' button.

If you do not wish to receive communications from us about special offers and promotions, you can opt-out of receiving these communications by following the instructions contained in the messages you receive. Even if you opt-out of receiving these messages, we reserve the right to send you certain communications relating to the services we provide, and we may send you service announcements and administrative messages.

Disclosure of Information

We may disclose information collected from and about you: (1) to our related companies and service providers, to perform a business, professional, technical support or other services for us; (2) to our marketing partners, business-to-business partners and clients, advertisers or other third parties, who may contact you with their own offers; (3) as necessary if we believe that there has been a violation of the Terms of Service or of our rights or the rights of any third party; (4) to respond to legal process (such as a search warrant, subpoena or court order) and provide information to law enforcement agencies or in connection with an investigation on matters



related to public safety, as permitted by law, or otherwise as required by law; and (5) in the event that YourCoach or substantially all of its assets are acquired (in which case, your personal information may be one of the transferred assets). We may also disclose your personal information with your express consent. We may share aggregate, anonymized information about Platform users with third parties.

Please note that if you voluntarily submit any personal information for posting on the Platform, such as a review or a post, the information becomes publicly available and can be collected and used by others. Additionally, when you register to use the Platform, your user profile will be visible to other clients and coaches on the Platform.

Sharing with Third Parties

We will obtain assurances from our service providers and agents that they will safeguard personal information consistently with this Privacy Policy. Examples of appropriate assurances that may be provided by agents include a contract obligating the agent to provide at least the same level of protection as is required by the relevant Privacy Shield Principles, being subject to Regulation (EU) No 5419/16 (“General Data Protection Regulation” or “GDPR”), or being subject to another European Commission adequacy finding. Where YourCoach has knowledge that an agent is using or disclosing personal information in a manner contrary to this Privacy Policy, YourCoach will take reasonable steps to prevent or stop the use or disclosure. However, non-personally identifiable information, including aggregated or de-identified information, may be provided to other parties for marketing, advertising, or other uses.

Interest-Based Advertising

We may use third-party advertising companies that use tracking technologies to serve our advertisements across the Internet. These companies may collect information about your visits to the Platform and other websites and your interaction with our advertising and other communications. These advertising companies serve ads on behalf of us and others on non-affiliated sites, and some of those ads may be personalized. Other companies may also use such technology to advertise on our Platform. You may choose to tell us not to collect and use this information, and in some jurisdictions, we will only engage in interest-based advertising if you opt-in. If you would like more information about this practice and to know your choices concerning interest-based ads, visit:

<http://www.networkadvertising.org/choices/>

www.aboutads.info/choices

In Canada, please visit: <http://youradchoices.ca/choices/>

In the EU, please visit: <http://www.youronlinechoices.eu/>

Access, Correction, & Deletion



You may access, correct or modify your personal information by signing into your user account. You may also exercise your rights, subject to applicable laws, to request that we delete or restrict access to your personal data, except to the extent necessary for us to retain it for legally permitted purposes. If you need assistance correcting or updating your personal information, or would like to request that we delete your personal information, please contact us as detailed in the “Contact Us” section below.

Retention of Personal Information

Personal information we collect, access or process will be retained only as long as necessary for the fulfillment of the purposes for which it was collected, unless otherwise provided in agreements between you and YourCoach, or as required or authorized by law, this Privacy Policy or the Terms of Service. Personal information that is no longer required to fulfill the identified purposes will be destroyed, erased or de-identified.

Security

We use industry-standard security measures designed to protect the confidentiality of personally identifiable information under our control and appropriately limit access to it. We have taken certain physical, electronic, and administrative steps designed to safeguard and secure the information we collect from users of the Platform. Even though we follow procedures to try to protect the information in our possession, no security is 100% secure, and we cannot promise, and you should not expect, that your information will be secure in all circumstances. We will notify you of any loss of data or breach of our security measures that has resulted in the loss or unauthorized access, disclosure, use or acquisition of personal information or otherwise presents a potential threat to such information, without undue delay, as required by law.

Children

The Platform is not directed to children, nor do we knowingly collect any personal information from children under the age of thirteen without verifiable parental consent. If you believe that a child has provided personal information to us without verifiable parental consent, please contact us promptly as described below. We will then make reasonable efforts to delete the child’s information from our database and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law).

Third Party Sites

The Platform may contain links to third-party websites or applications such as social media sites or applications, which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these third-party websites. If the Platform links or refers you to a third-party website or application, please consult the privacy policy of such third-party website or mobile application to understand how your personal



information will be treated. Sharing of your personal data with a third-party is solely at your own risk.

Your California Privacy Rights

California law permits our users who are California residents to request certain information about our disclosure of personal information to third parties for their own direct marketing purposes during the preceding calendar year. This request is free, and may be made once a year. To make such a request, please write to us at the following address:

[•]

ATT N: Customer Service Department—California Privacy Info.

Right to Removal of Posted

Information—California Minors

If you are under 18 years of age, reside in California, and have a registered account with us, you have the right to request removal of unwanted information that you publicly post on the Platform. To request removal of such information, you can contact us as provided below. Upon receiving such a request, we will make sure that the information is not publicly available on the Platform, but the information may not be completely or comprehensively removed from our systems and databases.

Visitors from Outside the United States—Cross-Border Transfer

The Platform is hosted in the United States. If you are visiting the Platform from outside the United States, your information may be transferred to, stored and processed in the United States or other countries in accordance with this Privacy Policy. The data protection and other applicable laws of the United States or other countries may not be as comprehensive as those laws or regulations in your country or may differ from the data protection or consumer protection laws in your country. Your information may be available to government authorities under lawful orders and law applicable in such jurisdictions. By using the Platform and/or providing personal information to us, you consent to transfer of your information to our facilities as described in this Privacy Policy.

Right to Lodge Complaints

We are transparent about the ways in which we collect and use personal information. If you have any concern or complaint about the way we handle your personal information, please contact us as described below. To the extent you believe we have not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory



authority in the country where you reside and/or the United States. You may contact the US Federal Trade Commission regarding your concerns. For more information, please see <https://www.ftc.gov/>

Contact Us

If you have questions or concerns about this Privacy Policy or how we collect and use your information, you can contact us by emailing us at privacy@yourcoach.health, or by postal address at 64 Bay 38th Street, #3A, Brooklyn, NY 11214 ; ATTN: Privacy Request.

If we need, or are required, to contact you concerning any event that involves your information, we may do so by email, telephone, or mail. If you make a purchase, we will send you a confirmation email.