

# TEKU PRIVACY POLICY

*Last Updated: April 13, 2022*

**1. THIS PRIVACY POLICY.** This Privacy Policy describes the information that Teku collects from you, how we use that information, how we share your information, our legal bases for doing so, and your rights regarding the information you provide to us. The terms “**Teku,**” “**we,**” “**us,**” and “**our**” refer to Saagara PLLC (dba Teku). The terms “**you**” and “**your**” refer to any person or organization accessing and/or using the Teku website, including any paid subscription services offered through the website and any content available on any part of the website (hereinafter, collectively, the “**Site**”). This Privacy Policy (this “**Policy**”) forms a part of our Terms of Use. We may modify this Policy from time to time. When we do, we will provide notice to you by publishing the most current version and revising the date at the top of this page. If we make any material change to this Policy, we will provide additional notice to you, such as by sending you an email or displaying a prominent notice on the Site.

**2. POLICY SCOPE.** This Policy does not apply to information that you have provided or made accessible to third parties, such as other members, network administrators, and others with whom you may share information about yourself. The Site may direct you to a third-party service, or a portion of the Site may be controlled by a third party. Disclosure of information to these third parties is subject to the relevant third party’s privacy policy. We are not responsible for any third-party’s privacy policy, even if we link to those sites and services from the Site.

Additionally, you are solely responsible for complying with all requirements of applicable privacy laws in connection with the information that you obtain for the purposes of communicating with other members on the Site.

## **3. INFORMATION WE COLLECT.**

**3.1 Information We Collect Directly from You.** We collect information that you provide directly to us. For example, we collect information that you provide when you create an account, build your profile, communicate with other members on the Site, or communicate with us. The types of information that we may collect include identifiers such as your name, username, password, email address, postal address, and phone number; credit card payment information and payment method data, if applicable; demographic information; and any other personal information that you choose to provide or make public, such as photos, interests, and other professional and personal information.

**3.2 Information Automatically Collected.** When you use the Site, we automatically collect activity-related information, including:

**Log Information:** We collect log information about your use of the Site, including the type of browser that you use; the time, duration, and frequency of your access; Site pages viewed; your IP address; and the page you visited before visiting the Site.

**Device Information:** We may collect information about the computer or mobile device that you use to access the Site, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

**Information from Cookies and Other Tracking Technologies:** We and our service providers collect information using various technologies, including pixel tags (also called clear GIFs, web beacons, or pixels) and cookies. Pixel tags are electronic images that may be used on the Site or in our emails, and track usage of the Site and effectiveness of communications. Cookies are small data files stored on your hard drive or in

device memory that track the Site usage in order to help us provide and improve Site functionality; support our security features; detect violations of our Terms of Use; analyze how the Site is performing, being accessed, and being used; and serve ads that may be relevant to you based on your stated or inferred interests, location, or other information. Most devices are set to accept cookies by default. If you prefer, you may be able to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of the Site.

**4. HOW WE USE YOUR INFORMATION.** We and our service providers process information about you where it is in our legitimate interests to do so and not overridden by your rights. We use your information in order to:

- authenticate your identity;
- display your profile;
- personalize, maintain, and optimize the Site for you;
- process your payment information (if applicable);
- communicate with you via email and SMS (text) messaging to provide you with account updates, reminders, and (when in line with the preferences you have shared with us) to provide you with interest-based information and advertising;
- respond to your comments, questions, and requests, and provide customer service and support;
- monitor and analyze trends, usage, and activities in connection with the Site;
- support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error, or any illegal or prohibited activity;
- comply with applicable laws and respond to legal requests;
- maintain, improve, and further develop the Site;
- perform contracts with our service providers;
- carry out any other purposes described to you at the time that we collect the information.

If you are in a jurisdiction that requires a specific legal basis for processing personal data, our legal basis for collecting and using the information described in this Policy will depend on the type of information and the specific context in which we collect it but will fall into one or more of the above categories.

## **5. HOW WE SHARE YOUR INFORMATION.**

**5.1 Through the Site.** We share some of the information that we collect by displaying it on the Site according to your member profile and account settings. Some information, such as your username, is always public. Some information is public by default but can be hidden. Information that is public on the Site may be visible to others on and off the Site.

**5.2 With Our Service Providers.** We use service providers in connection with operating and improving the Site to assist with certain business purposes, such as payment processing, email transmission, conducting surveys or contests, data hosting, analyzing Site user data, managing our ads, and some aspects of our technical and customer support. These service providers, which include data analytics providers, may access, process, and store information about you on our behalf for the purposes we authorize, subject to confidentiality obligations.

**5.3 Compliance and Protection.** We may access, preserve, and disclose information about you (including your messages) to government entities and other third parties if we believe disclosure is in accordance with, or required by, applicable law, regulation, legal process, or audits. We may also disclose information about you if we believe that your actions are inconsistent with our Terms of Use, or if necessary to protect the rights, property, or safety of, or prevent fraud or abuse of, Teku or others.

**5.4 Merger, Sale, or Other Asset Transfers.** If Teku is involved in a merger, acquisition, financing, reorganization, bankruptcy, or sale of our assets, information about you may be shared, sold, or transferred as part of that transaction. We may also share information about you with current or future affiliates.

**5.5 Crisis Management.** Teku cares deeply about the health and wellbeing of our community, and thus we make disclosures as needed to protect youth and others. Our policy is to alert law enforcement, state authorities, or emergency services if your communications with Teku indicate that you are at imminent risk of death or serious injury to yourself or others (i.e., if you have suicidal desire, a plan, access to means, and an imminent timeline).

**5.6 Abuse and Imminent Threats.** If your communications indicate that a minor or vulnerable dependent adult has been or is currently being subjected to emotional or physical abuse or neglect, we may report this to the applicable state agency or other authority, which may include disclosing information relating to the particular situation, and may include personal or sensitive information you disclose to us.

We may also make a report to an appropriate party, and make any disclosures we reasonably believe necessary, to prevent another person's death or serious injury. Unless otherwise required by applicable law (including in response to a subpoena that we reasonably believe is valid), we will not disclose personal or sensitive information to parents, legal guardians, or other individuals.

Our service providers are located in multiple states in the United States; while all of our services providers are trained and supervised, our staff are not working as licensed mental health workers and may not be trained in your state's law. Other state laws may apply to your communications, and those state laws may not protect your communications to the same degree, or in the same way, as the laws of your state.

**5.7 Research and Innovation.** We may use information, including the content of conversations occurring in coaching, classes or other sessions, to create, or permit a third-party researcher or partner to create, aggregate information, that does not include names or other personal identifiers, for the purpose of promoting family mental health research and the advancement of mental health preventive efforts, and to produce statistics and metrics that will help us and others better understand and analyze the impact of our Services. We may share aggregated, non-personally identifiable information and any content of conversations occurring on the Service, with our partners, researchers, or third parties for these purposes. We may also publicly publish the results of our research efforts, including statistics and metrics, such as in white papers and other research reports, and otherwise provide information about our innovation efforts and use of our services. Individual users will not be linked or identified by sharing this aggregate information.

**5.8 Advocacy.** We are passionate about promoting youth and family mental health, and our work involves various efforts, such as advocating for laws that protect youth and families. The information we collect relating to our Services can be used as valuable evidence in supporting these efforts. We may use and disclose personal and sensitive information, in an anonymized form without using names or personally-identifying information, for these purposes, including using this information in amicus briefs, litigation, legislative testimony, and other activities.

**5.5 Other Situations.** We may de-identify or aggregate information about you and share it freely, so that you can no longer be identified. Such information is not subject to this Policy. We may also share information about you with your consent or at your direction or where we are legally entitled to do so.

**6. HOW WE PROTECT YOUR INFORMATION.** We secure your personal information using industry-standard physical, procedural, and technical measures designed to prevent unauthorized or unlawful access, disclosure, or destruction of information. However, no data transmission or storage system can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot ensure or warrant the security of any information you transmit to us, and you use the Site and provide us with your information at your own risk. If you have reason to believe that your personal information is no longer secure (for example, your Teku account password may have been compromised), please immediately email us at [info@jointeku.com](mailto:info@jointeku.com).

**7. STORAGE AND RETENTION OF YOUR INFORMATION.** Teku is based in the United States. Information about you will be transferred to, and processed in, the U.S. and countries other than the country in which you are resident. These countries may have data protection laws that are different from the laws of your country and, in some cases, may not be as protective. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy and that no transfer of your personal information will take place to an organization or a country unless there are adequate controls in place regarding the security of your information.

We will retain your information as long as your account is active, and to the extent necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Please note that, except as required by applicable law or our specific agreements with you, we will not be obligated to retain your personal information for any particular period and we are free to securely delete it or restrict access to it for any reason and at any time, with or without notice to you.

**8. YOUR RIGHTS TO YOUR INFORMATION.** You may at any time request that we update, correct, or delete your personal information by emailing us at [info@jointeku.com](mailto:info@jointeku.com). Additionally:

- **U.S. State Privacy Rights.** Certain U.S. states (including, but not limited to, California, Colorado, Illinois, and Virginia) provide their state residents with additional legal rights concerning their personal information. If you are a resident of one of these states and are using the Site, you have the right to: (i) have Teku disclose further details on the categories and pieces of personal information that we have collected about you; (ii) have Teku disclose information on what personal information we plan on collecting about you before we collect it; (iii) opt out of our marketing and/or analytics activities; (iv) have Teku delete any personal information which we have collected about you; (v) ensure that Teku does not sell your personal information; and (vi) ensure that Teku provides you with equal services without discrimination (Teku does not discriminate against any user in providing access to its Services). Please note that we do not alter the Site's data collection and use practices when we see a Do Not Track signal from your browser. If you would like to make a state law-related request, please email us at [info@jointeku.com](mailto:info@jointeku.com). Please note that we may ask you to verify your identity before responding to the request, and that we have 30 days to respond to you.
- **Your Rights Under General Data Protection Regulation (GDPR).** If you are a resident of the European Economic Area (EEA), please see Sections 3 and 4 of this Policy for a list of the legitimate business reasons why we collect and use your personal information. Under the GDPR you have certain additional data protection rights, including the right to: (i) access, update, or delete the information we have collected on you; (ii) have your information rectified if that information is inaccurate or incomplete; (iii) object to our processing of your personal information; (iv) request that we restrict the processing of your personal information; (v) be provided with a copy of your personal

information in a structured, machine-readable, and commonly used (i.e., data-portable) format; (vi) withdraw your consent at any time where Teku relied on your consent to process your personal information; and (vii) complain to a data protection authority about our collection and use of your personal information. For more information on how to lodge such a complaint, please contact your local data protection authority in your EEA Member State. If you would like to make a GDPR-related request, please email us at [info@jointeku.com](mailto:info@jointeku.com). Please note that we may ask you to verify your identity before responding to the request, and that we have one month to respond to you.

**9. CONTACTING US; PRIVACY COMPLAINTS.** If you have any questions, concerns, or complaints about this Policy or the way we process your personal information, or if you want to exercise your rights as described above, please contact us by email at [info@jointeku.com](mailto:info@jointeku.com). Additionally, you also have the right to lodge a complaint with your state or national data protection enforcement agency.

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