

Privacy Policy

Thank you for choosing to be a part of our community at ReachU LLC (“the Company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact info@reachuapp.com.

When you use our mobile application and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy policy, we seek to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. We hope you take the time to read through it carefully, as it is important. If there are any terms in this policy that you do not agree with, please discontinue use of our mobile application and our services.

This privacy policy applies to all information collected through our mobile application (“App”) and/or any related services, sales, marketing, or events (“Services”).

Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.

What information do we collect?

We collect personal information that you provide to us such as email address, school, and major, as well as information you generate like content engagement, event attendance, or personal usage metrics.

We collect personal information that you voluntarily provide to us when registering to the App, contacting us, or when you generate data by using the App and its features.

The personal information we collect includes but is not limited to, email address, college, school, major, ethnicity and grade classification.

The information that you generate while using the App includes browsing history within the app, event attendance through check-in features, content engagement metrics or wellness scores. All information generated in the App is protected by Amazon Web Services as well as internal safeguards including:

- Employee Training on Data Privacy
- Periodic Security Risk Assessments
- Access Logging for Sensitive Information

We collect information regarding your mobile device and push notifications when you use our App. We may request access or permission to certain features from your mobile device like your camera. You may change this access through your device settings.

We may request to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

How do we use your information?

We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you or our business partners, compliance with our legal obligations, and/or your consent.

We use personal information collected via the App for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you or our business partners, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon process.** The information you volunteer during the signup process is used for communication purposes and to have demographic representation of our usership.
- **Request Feedback.** We may use your information to request feedback and to contact you about your use of our App.
- **To enforce our terms, conditions and policies for Business Purposes, Legal Reasons and Contractual.**
- **To respond to legal requests and prevent harm.** If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.
- **To deliver services to the users.** We may use your information to provide you with the requested service.
- **For other business purposes.** We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our features and to evaluate and improve our App and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We may aggregate your data with other users to share with our business partners. We will never use identifiable personal information without your express consent.

Will your information be shared with anyone?

We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations.

We may process or share data based on the following legal basis:

- **Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.
- **Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- **Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- **Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, government requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- **Vendors, Consultants and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services or customer service. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company, subsidiaries, joint venture partners or other companies that we control or that are under common control with us. This also includes the university that has subscribed to our app.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.

How long do we keep your information?

We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or

permitted by law (such as tax, accounting, or other legal requirements). No purpose in this policy will require us to keep your personal information past the termination of the user's account. When we have no ongoing legitimate business need to process your personal information, we will further anonymize it, if that is not possible we will store your personal information and isolate it from further processing until deletion is possible.

How do we keep your information safe?

We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. Our service provider has completed numerous security evaluation processes. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we do our best to protect your personal information, transmission of personal information to and from our App is at your own risk. You should only access the services within a secure environment.

We employ several organizational security measures including regular security risk assessments, access logging for sensitive information, and termination policies for employees who misappropriate your data

What are your privacy rights?

You may review, change, or terminate your account at any time.

When you delete your account, we delete all your personal information and any/all information that you have generated while using the App. You may also request a log of the information you have generated, or request to make an amendment to your information.

Account Information

If you would like to review or change the information in your account or terminate your account, you can contact us at info@reachuapp.com

Upon your request to terminate your account, we will deactivate your account and all associated information from our active databases. However, some information may be retained in our files to troubleshoot problems, assist with and investigations, enforce our Terms of Use and/or comply with legal requirements.

Opt out of email marketing. You can unsubscribe from our marketing email list at any time by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may access your account settings and update preferences or contact us using the

contact information provided. You can also set these preferences when you register for your account.

Virtual meetings

Please note that this mobile app may facilitate meetings through virtual web calling for user convenience. Any interactions, discussions, or engagements conducted during virtual meetings are voluntary and not required, governed, or guaranteed by the app developer. The app developer disclaims any liability arising from or related to interactions that occur during virtual meetings facilitated by the app.

Controls for do-not-track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track (DNT) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future we will inform you about that practice in a revised version of this privacy policy.

Do California residents have specific privacy rights?

Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below or by using the above mentioned functionality in the App.

If you are under 18 years of age, reside in California, and have a register account with the App, you have the right to request removal of unwanted data that you publicly post to the App. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the App, but please be aware that the data may not be completely or comprehensively removed from our systems.

Do we update this policy?

Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we ay notify you either by email or a notice within the App. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

How can you contact us about this policy?

If you have questions or comments about this policy, you may contact our Data Protection Team by email at info@reachuapp.com.

This document was last updated on December 7th, 2023