

# MentorHub: Privacy Policy Update 08-20-2021

Last updated August 20, 2021

Thank you for choosing to be part of our community at "Supportive Accountability Hub, Inc." a 5013(c) organization and "Supportive Accountability Hub LLC" DBA "MentorHub LLC" ("**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 this privacy notice or our practices with regard to your personal information, please contact us at [info@mentorhubapp.com](mailto:info@mentorhubapp.com).

This privacy notice describes how we might use your information if you:

- Visit our website at <https://mentorhubapp.com>
- Download and use our mobile application – MentorHub App
- Engage with us in other related ways – including any sales, marketing, or events

In this privacy notice, if we refer to:

- "**Website**," we are referring to any website of ours that references or links to this policy
- "**App**," we are referring to any application of ours that references or links to this policy, including any listed above
- "**Services**," we are referring to our Website, App, and other related services, including any sales, marketing, or events

The purpose of this privacy notice is 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. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

## **Children Under the Age of 13**

Children under the age of 13 are allowed to use the App only with prior, verifiable written approval by a parent or legal guardian in accordance with the Children's Online Privacy

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Protection Act. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at [info@mentorhubapp.org](mailto:info@mentorhubapp.org).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [your California Privacy Rights](#) for more information.

**Please read this privacy notice carefully, as it will help you understand what we do with the information that we collect.**

## 1. WHAT INFORMATION DO WE COLLECT?

### **Personal information you disclose to us**

*In Short:* We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and services when you participate in activities on the Services (such as by posting messages in our online forums or entering competitions, contests or giveaways) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us and the Services, the choices you make, and the products and features you use. The personal information we collect may include the following:

**Personal Information Provided by You.** We collect names; phone numbers; email addresses; usernames; passwords; contact preferences; and other similar information.

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All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

## Information automatically collected

*In Short: Some information – such as your Internet Protocol (IP) address and/or browser and device characteristics – is collected automatically when you visit our Services.*

We automatically collect certain information when you visit, use or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser, and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

The information we collect includes:

- *Log and Usage Data.* Log and usage data are service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type, and settings, and information about your activity in the Services (such as the date/time stamps associated with your usage, pages, and files viewed, searches and other actions you take such as which features you use), device event information (such as system activity, error reports (sometimes called 'crash dumps') and hardware settings). Our App uses proprietary analytics tools to track users on our platform and to analyze and gain knowledge from the usage data that is collected. The App may

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use third-party analytics providers, such as Google Analytics, to understand how our App is used.

- *Device Data.* We collect device data such as information about your computer, phone, tablet, or other devices you use to access the Services. Depending on the device used, this device data may include information such as your IP address (or proxy server), device and application identification numbers, location, browser type, hardware model Internet service provider and/or mobile carrier, operating system, and system configuration information.
- *Location Data.* We do not collect location data such as information about your device's location.
- *User Contributions.* You also may provide information (such as chats) to be transmitted to other users of the App (your mentor or mentee, our App Administrator, and the program administrator provided by the entity sponsoring your mentor/mentee relationship) or to others (including and affiliated or independent third-party researchers). Such transmissions, together with any survey responses that you provide, are collectively referred to as "User Contributions". Your User Contributions are transmitted at your own risk. Although we limit access to your User Contributions, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the App with whom you may choose to share your User Contributions. We do not select, approve, or control any Mentors; nor do we authorize participation by individual Mentees. The entity sponsoring each mentor/mentee relationship is responsible for the selection, approval, and control of Mentors and for authorizing participation by individual Mentees. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.
- *The MentorHub Assessment.* The MentorHub assessment is designed to help the program administrators better match mentors with mentees. An Anonymized version of this data may be used in the future to improve the app and for research purposes. The MentorHub allows an easy and convenient way for mentors and mentees to chat inside the app and on the website. The chats will only be visible to the mentors, mentees, and program administrators. The program administrator can review chats

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that are flagged for further review if it is deemed to be harmful to either the mentor or mentee. Chats that are not flagged for further review will be deleted after 12 months.

- *Use of the "Mood Ring" or "Check-In" Feature.* The "Mood Ring" or "Check-In" feature is a highly recommended feature of MentorHub that helps mentees to see their moods over time and helps mentors better connect with mentees. Although this feature is highly recommended, mentees have the option to choose not to use the application. We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us. The MentorHub App contains links or references to applications that are operated by third parties. This privacy policy does not apply to the practices of these other parties. We encourage you to read the privacy policy of every app that you download.

### Information collected through our App

*In Short:* We collect information regarding your mobile device when you use our App.

If you use our App, we also collect the following information:

- *Mobile Device Access.* We may request access or permission to certain features from your mobile device. If you wish to change our access or permissions, you may do so in your device's settings.
- *Mobile Device Data.* We automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information, and system configuration information, device, and application identification numbers, browser type and version, hardware model Internet service provider, and/or mobile carrier, and Internet Protocol (IP) address (or proxy server). If you are using our App, we may also collect information about the phone network associated with your mobile device, your mobile device's operating system or platform, the type of

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mobile device you use, your mobile device's unique device ID, and information about the features of our App you accessed.

This information is primarily needed to maintain the security and operation of our App, for troubleshooting, and for our internal analytics and reporting purposes.

## 2. HOW DO WE USE YOUR INFORMATION?

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

We use personal information collected via our Services 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, 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.** If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- **Request feedback.** We may use your information to request feedback and to contact you about your use of our Services.
- **To enable user-to-user communications.** We may use your information in order to enable user-to-user communications with each user's consent in the MentorHub App.
- **To manage user accounts.** We may use your information for the purposes of managing our account and keeping it in working order.

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- **To send administrative information to you.** We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
- **To protect our Services.** We may use your information as part of our efforts to keep our Services safe and secure (for example, for fraud monitoring and prevention).
- **To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements, or in connection with our contract.**
- **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 deliver and facilitate the delivery of services to the user.** We may use your information to provide you with the requested service.
- **To respond to user inquiries/offer support to users.** We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.
- **To send you marketing and promotional communications.** We and/or our third-party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. For example, when expressing an interest in obtaining information about us or our Services, subscribing to marketing, or otherwise contacting us, we will collect personal information from you. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS?" below).
- **Deliver targeted advertising to you.** We may use your information to develop and display personalized content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:** 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 your data that we hold based on the following legal basis:

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- **Consent:** We may process your data if you have given us specific consent to use your personal information for 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, governmental requests, a judicial proceeding, court order, or legal processes, 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:

- **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.
- **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, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with our Services over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, pages, or features, and better understand online



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activity. Unless described in this notice, we do not share, sell, rent, or trade any of your information with third parties for their promotional purposes.

- **Mentors, Mentees, and Administrators.** Information is shared between mentors or mentees with whom you are in a mentoring relationship, and to the program and MentorHub administrators with responsibility for oversight of that relationship.
- **Affiliated and independent third-party researchers.** Information is shared with affiliated and independent third-party researchers who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- **Interaction with Third-Party Websites and Services.** You can interact with third-party websites and services that you access through the MentorHub App. We will from time to time partner with third-party content providers as a part of the App. You may access a [list of the current third-party content providers](#) here. Third-party content will be accessed through the websites or applications maintained by third-party partners. We do not own or control these websites or services, and we assume no responsibility for the content, privacy policies, or practices of any third-party websites or services. We do not warrant the offerings of any of these third parties. Any information you provide to a third party when on its website or application, or that is automatically collected by the third-party as a result of your use of its website or application, is subject to the third-party's privacy policy.
- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners, or other companies that we control or that are under common control with us.
- **Business Partners.** We may share your information with our business partners to offer you certain products, services, or promotions.
- **Other Users.** When you share personal information or otherwise interact with public areas of the Services, such personal information may be viewed by all users and may be publicly made available outside the Services in perpetuity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our Services, and view your profile.

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- Terms and Conditions. We may share your information to enforce or apply our [Terms and Conditions of Use](#) and other agreements.

## 4. WHO WILL YOUR INFORMATION BE SHARED WITH?

*In Short:* We only share information with the following categories of third parties.

We only share and disclose your information with the following categories of third parties. If we have processed your data based on your consent and you wish to revoke your consent, please contact us using the contact details provided in the section below titled "HOW CAN YOU CONTACT US ABOUT THIS NOTICE?".

- Cloud Computing Services
- Data Analytics Services
- Data Storage Service Providers
- Product Engineering & Design Tools
- Testing Tools
- User Account Registration & Authentication Services
- Website Hosting Service Providers
- Communication & Collaboration Tools
- Performance Monitoring Tools

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

*In Short:* We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information.

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## 6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

*In Short:* We may transfer, store, and process your information in countries other than your own.

Our servers are located in the United States. If you are accessing our Services from outside the United States, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in the United States, and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

European Commission's Standard Contractual Clauses:

We have implemented measures to protect your personal information, including by using the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies and between us and our third-party providers. These clauses require all recipients to protect all personal information that they process originating from the EEA or UK in accordance with European data protection laws and regulations. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

## 7. HOW LONG DO WE KEEP YOUR INFORMATION?

*In Short:* We keep your information for as long as necessary to fulfill the purposes outlined in this privacy notice unless otherwise required by law.

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We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us to keep your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:** 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 secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information is protected through token-based authentication and all requests are validated against user roles. A user must provide credentials to get a token (which is a unique encrypted string to identify the user). Once issued, the token is required to authorize any information access. All information access requests are monitored and protected against common web attacks using firewalls. The firewall rules address OWASP vulnerabilities. IP Whitelisting & rate limiting giving additional protection. The data is stored in MongoDB provided by MongoDB Atlas cloud services (a product of Mongo, Inc.), by which basic information is encrypted and database access is restricted through authentication. Network communication is through encrypted channels. Chat-based information is kept in Firebase Realtime Database and protected with

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authentication and rules-based access validation. All communication through networks is encrypted using SSL.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the App like message boards. The information you share in public areas may be viewed by any user of the App.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, the transmission of personal information to and from our Services is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the App.

## 9. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:** In some regions, such as the European Economic Area (EEA) and United Kingdom (UK), you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

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If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[https://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm).

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

If you have questions or comments about your privacy rights, you may email us at [info@mentorhubapp.org](mailto:info@mentorhubapp.org).

## **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log in to your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use, and/or comply with applicable legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default.

If you prefer, you can usually choose to set your browser to remove cookies and to reject

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cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Services. To opt-out of interest-based advertising by advertisers on our Services visit <http://www.aboutads.info/choices/>.

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example, to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may:

- Access your account settings and update your preferences.

## 10. 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. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently 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 notice.

## 11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:** 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

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charge, information about categories of personal information (if any) we disclosed to third parties for direct 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.

If you are under 18 years of age, reside in California, and have a registered account with a Service, you have the right to request the removal of unwanted data that you publicly post on the Services. To request the 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 Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

### **CCPA Privacy Notice**

The California Code of Regulations defines a "resident" as:

- (1) every individual who is in the State of California for other than a temporary or transitory purpose and
- (2) every individual who is domiciled in the State of California who is outside the State of California for a temporary or transitory purpose

All other individuals are defined as "non-residents."

If this definition of "resident" applies to you, we must adhere to certain rights and obligations regarding your personal information.

### **What categories of personal information do we collect?**



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We have collected the following categories of personal information in the past twelve (12) months:

Category	Examples	Collected
A. Identifiers	Contact details, such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, Internet Protocol address, email address, and account name	YES
B. Personal information categories listed in the California Customer Records statute	Name, contact information, education, employment, employment history, and financial information	YES
C. Protected classification characteristics under California or federal law	Gender and date of birth	YES
D. Commercial information	Transaction information, purchase history, financial details, and payment information	NO
E. Biometric information	Fingerprints and voiceprints	NO
F. Internet or other similar network activity	Browsing history, search history, online behavior, interest data, and interactions with our and other websites, applications, systems, and advertisements	NO

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G. Geolocation data	Device location	NO
H. Audio, electronic, visual, thermal, olfactory, or similar information	Images and audio, video, or call recordings created in connection with our business activities	NO
I. Professional or employment-related information	Business contact details in order to provide you our services at a business level, job title as well as work history and professional qualifications if you apply for a job with us	NO
J. Education Information	Student records and directory information	YES
K. Inferences drawn from other personal information	Inferences drawn from any of the collected personal information listed above to create a profile or summary about, for example, an individual's preferences and characteristics	NO

We may also collect other personal information outside of these categories instances where you interact with us in-person, online, or by phone or mail in the context of:

- Receiving help through our customer support channels;
- Participation in customer surveys or contests; and
- Facilitation in the delivery of our Services and to respond to your inquiries.

### **How do we use and share your personal information?**

More information about our data collection and sharing practices can be found in this privacy notice.

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You may contact us by email at [info@mentorhubapp.com](mailto:info@mentorhubapp.com), by visiting <https://mentorhubapp.com/contact-mentorhub/>, or by referring to the contact details at the bottom of this document.

If you are using an authorized agent to exercise your right to opt-out we may deny a request if the authorized agent does not submit proof that they have been validly authorized to act on your behalf.

## **Will your information be shared with anyone else?**

We may disclose your personal information with our service providers pursuant to a written contract between us and each service provider. Each service provider is a for-profit entity that processes the information on our behalf.

We may use your personal information for our own business purposes, such as for undertaking internal research for technological development and demonstration. This is not considered to be "selling" of your personal data.

MentorHub, LLC has disclosed the following categories of personal information to third parties for a business or commercial purpose in the preceding twelve (12) months:

- Category B. Personal information, as defined in the California Customer Records law, such as your name, contact information, education, employment, employment history, and financial information.

The categories of third parties to whom we disclosed personal information for a business or commercial purpose can be found under "WHO WILL YOUR INFORMATION BE SHARED WITH?".

MentorHub, LLC has not sold any personal information to third parties for a business or commercial purpose in the preceding twelve (12) months. MentorHub, LLC will not sell

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personal information in the future belonging to website visitors, users, and other consumers.

## Your rights with respect to your personal data

### Right to request deletion of the data - Request to delete

You can ask for the deletion of your personal information. If you ask us to delete your personal information, we will respect your request and delete your personal information, subject to certain exceptions provided by law, such as (but not limited to) the exercise by another consumer of his or her right to free speech, our compliance requirements resulting from a legal obligation or any processing that may be required to protect against illegal activities.

### Right to be informed - Request to know

Depending on the circumstances, you have a right to know:

- whether we collect and use your personal information;
- the categories of personal information that we collect;
- the purposes for which the collected personal information is used;
- whether we sell your personal information to third parties;
- the categories of personal information that we sold or disclosed for a business purpose;
- the categories of third parties to whom the personal information was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling personal information.

In accordance with applicable law, we are not obligated to provide or delete consumer information that is de-identified in response to a consumer request or to re-identify individual data to verify a consumer request.

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## Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights

We will not discriminate against you if you exercise your privacy rights.

## Verification process

Upon receiving your request, we may need to verify your identity to determine you are the same person about whom we have the information in our system. These verification efforts require us to ask you to provide information so that we can match it with the information you have previously provided us. For instance, depending on the type of request you submit, we may ask you to provide certain information so that we can match the information you provide with the information we already have on file, or we may contact you through a communication method (e.g. phone or email) that you have previously provided to us. We may also use other verification methods as the circumstances dictate.

We will only use the personal information provided in your request to verify your identity or authority to make the request. To the extent possible, we will avoid requesting additional information from you for the purposes of verification. If, however, we cannot verify your identity from the information already maintained by us, we may request that you provide additional information for the purposes of verifying your identity, and for security or fraud prevention purposes. We will delete such additionally provided information as soon as we finish verifying you.

## Other privacy rights

- you may object to the processing of your personal data
- you may request correction of your personal data if it is incorrect or no longer relevant, or ask to restrict the processing of the data
- you can designate an authorized agent to make a request under the CCPA on your behalf. We may deny a request from an authorized agent that does not submit proof that they have been validly authorized to act on your behalf in accordance with the CCPA.

# MentorHub: Privacy Policy Update 08-20-2021

- you may request to opt-out from future selling of your personal information to third parties. Upon receiving a request to opt-out, we will act upon the request as soon as feasibly possible, but no later than 15 days from the date of the request submission.

To exercise these rights, you can contact us by email at [info@mentorhubapp.com](mailto:info@mentorhubapp.com) or, by visiting <https://mentorhubapp.com/contact-mentorhub/>. If you have a complaint about how we handle your data, we would like to hear from you.

## 12. DO WE MAKE UPDATES TO THIS NOTICE?

*In Short:* Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice 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 notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 13. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), Debbie Reynolds, by email at [dpo@debbiereynoldsconsulting.com](mailto:dpo@debbiereynoldsconsulting.com).

## 14. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please visit <https://mentorhubapp.com/contact-mentorhub/>.