



Privacy Policy

1. About Your Privacy and This Privacy Policy

Your privacy is extremely important to us. We are constantly putting a great deal of thought, effort, tools, resources and procedures in place in order to protect and safeguard your privacy. This document is our "Privacy Policy," and it contains details on issues related to your privacy when using our services. This Privacy Policy applies to visitors to the public websites owned and operated by Equilibrium Technologies Private Limited (BeMe), the registered users of BeMe's associated mobile and web application (collectively with the websites, the "Platform"), and to the providers that provide the Provider Services ("Providers"). It is intended to inform you of our policies, procedures, and practices regarding the collection, use and disclosure of any information that you provide through the Platform.

The Privacy Policy does not apply to the collection and use of certain employment-related information for employees of BeMe or its parent company. If you are a current or former BeMe job applicant, employee, owner, director, officer, or contractor, please contact us at support@beme.global for the appropriate notice.

The Privacy Policy is part of our Terms and Conditions. The terms in the Privacy Policy (such as, but not limited to, "we", "our", "us", "Platform", and "Counselor Services") have the same meaning as in our Terms and Conditions document. When you use our Platform, you accept and agree to both the Terms and Conditions and to the Privacy Policy. If you do not agree to be bound to the Privacy Policy you should stop using the Platform immediately or cease to provide the Counselor Services, as applicable. By accessing and using our Platform or providing the Counselor Services, as applicable, you affirm that you have read the Terms and Conditions and the Privacy Policy and that you understand, agree to and acknowledge all the terms contained in both of them.

2. Information Collection, Use, and Disclosure

Categories of Information Collected

To let us operate the Platform effectively and to let you use the Platform, including the Provider Services, we may collect, use, and store the information described below. We also disclose certain information to third parties, as described further below. The information we collect is received directly or indirectly from you and generated in the course of your use of the Platform. The data we collect is not used for marketing or any other purposes except as specified in this Privacy Policy.

Visitor Data: BeMe collects, uses, and stores data regarding user visits to its website and use of the BeMe application ("Visitor Data"), including the particular pages visited or viewed by the user, the amount of time the user spent on the website or application, website errors experienced by the user, visits to the BeMe "FAQ" page, and information about the browser or device used to access the website and application, such as the user's mobile device ID and IP address. These practices apply to users who visit pages for prospective new customers as well as those who visit pages for prospective Providers.



Onboarding Data: In addition to the questionnaire responses provided by users (including Providers) in the process of initial registration, BeMe collects, uses, and stores certain additional data from users during the onboarding process ("Onboarding Data"). This data includes the pages viewed by the user, whether the user clicks the "Get started" link to begin completing the questionnaire, and whether the user responds to any of the questionnaire prompts.

Account Registration Data: BeMe collects, uses, and stores certain information in connection with the account registration process, such as whether users registered using their Facebook or Google profiles, and whether a user verifies their reported email address or phone number ("Account Registration Data"). BeMe also assigns each user (including Providers) who creates a BeMe account an anonymized, sequentially-generated client ID.

Transaction Data: Be Me collects, uses, and stores certain information regarding payment for its services by users and related transactions on its website, such as whether a user completed payment for Be Me's services, ("Transaction Data").

Login Data: BeMe collects, uses, and stores data regarding logins to Be Me's Platform by registered users (including Providers) and activity conducted during that log in such as when a user logs in, the number of messages received or sent through Be Me's website or app during that log in, and whether a user has been assigned, started, or completed a counseling goal ("Login Data"). Login Data does not include the content of any messages sent or received by users or the content of any counseling goals.

Counseling Session Data: BeMe collects, uses, and stores certain general data regarding user counseling sessions such as whether a live session has been scheduled by the user, whether a Counselor or user joins a scheduled session, when a counseling session began and ended, and whether a counseling session was canceled or rescheduled.

Customer Data: BeMe collects, uses, and stores certain data from users that have signed up for Be Me's services such as a user's self-reported name or nickname, age, e-mail address, phone number, and emergency contact information ("Customer Data").

Provider Data: In order to identify, credential, re-credential, run checks, and pay Providers, Be Me collects, uses, and stores certain data from Counselors. This data includes information such as the Provider's name, bank account information, governmental identification numbers, e-mail address, phone number, address, PMC number (if applicable) NPI number (if applicable), CAQH number (if applicable), APA number (if applicable), BPS number (if applicable) and education and job history ("Provider Data").

Communications Data: BeMe collects, uses, and stores communications between users and Providers on the Platform, and communications between users including sessions conducted through voice, video and chat services and Be Me's customer service team ("Communications Data").

Protecting this information is important for us. Other than in the ways detailed in this Privacy Policy, we will never use or disclose any information unless you requested or approved us to do so.



Purposes for Which Information Is Used

We may use the information we collect for one or more of the following purposes:

Communication with you

- o To contact you or provide you with information, alerts and suggestions that are related to the Platform.
- o To verify your identity.
- o To complete an activity you requested, such as register for the Platform or obtain more information.
To reach out to you, either ourselves or using the appropriate authorities, if we have a good reason to believe that you or any other person may be in danger or may be either the cause or the victim of a criminal act.

Delivery of services to you

- o To create your account on our Platform and let you log in to your account and use the Platform.
- o To manage your account, provide you with customer support, and ensure you are receiving quality service.
- o For billing and transaction processing purposes.
To match users with Providers and facilitate the Provider Services.
To provide, support, personalize, and develop our Platform and the Provider Services.

Administration and improvement of services

- o To supervise, administer and monitor the Platform.
- o To measure and improve the quality, effectiveness, and delivery of our services.

Customization

- o To personalize the website experience and to deliver content and product and service offerings relevant to individual interests, including targeted offers and ads.

Compliance with law

- o To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- o To comply with applicable state and federal laws, including, but not limited to laws related to protecting client and public health and safety.
- o To allow providers to comply with the licensure, legal and quality requirements in their jurisdictions.

Other uses with consent

- o Any other purpose with your consent.



Purposes for Which Information Is Disclosed to Third Parties

Information about you may be disclosed to third parties for one or more of the following purposes:

For business purposes: Only as necessary for facilitating the Provider Services, we may share a user's information with a Provider and a Provider's information with a user. We may also share your information with vendors and service providers, including our data hosting and data storage partners, analytics and vendors providing technology services and support, payment processing, and data security. We also may share information with professional advisers, such as auditors, law firms, and accounting firms.

With your direction or consent: We may share your information with third parties if you request or direct us to do so.

With affiliates within our corporate group: We may share your information with any subsidiaries or parent companies within our corporate group.

For advertising: If you opt-in to the use of targeting cookies and web beacons, information regarding your activity on our websites, excluding activity when you are logged in and have started therapy, may be disclosed to our advertising partners to optimize marketing. We do not share with any advertising platform private information like member names, email addresses, phone numbers, diagnosis, session data, journal entries, messages, worksheets, or any other type of communication you have with your client.

Compliance with law: We may share your information with a court, a regulatory entity, law enforcement personnel, or pursuant to a subpoena, to comply with applicable law or any obligations thereunder.

In the context of a transaction: We may share your information in connection with an asset sale, merger, bankruptcy, or other business transaction.

For other business reasons: We may share your information to enforce any applicable Terms and Conditions and Terms of Use, and to ensure the safety and security of the Platform and our users.

Note that if you make any information publicly available on the Platform, anyone may see and use such information.

3. Opting-out of Marketing Communication

You can opt out of receiving email marketing by unsubscribing using the unsubscribe link provided in all of our marketing email communications.



4.Cookies and Web Beacons

Like many websites, we use "cookies" and "web beacons" (also known as pixels) to collect information. A "cookie" is a small data file that is transferred to your computer's hard disk for record-keeping purposes. We collect cookies that are necessary for the Platform to function, cookies that enhance the Platform's performance, and cookies used for third-party tracking. A "web beacon" is a tiny and sometimes invisible image or embedded code, placed on a Web page or email that can report your visit or use to a third party. Web beacons are typically used by third parties to monitor the activity of users at a website for the purpose of web analytics, advertising optimization, or page tagging. Additional information regarding web beacons is available on Wikipedia.

You can change your browser's settings so it will stop accepting cookies and web beacons or to prompt you before accepting a cookie or web beacon.

Use of Cookies, Web Beacons, and Similar Technology for Analytics

We may use third party cookies or web beacons for the purposes of web analytics, attribution, and error management. Our Platform may use vendor services that use cookies, web beacons, and similar technology to collect and store anonymous information about you, including when you pay for services, load a page, indicate that you heard about us on television, sign up for services, enter your payment information (but the payment details are not disclosed), start the intake questionnaire, and your response as to the referral source to the Platform.

Our Platform also uses analytics vendors to collect information (for example, Visitor Data and Onboarding Data) about user actions on our websites for purposes of analytics and analysis of certain Platform usage.

Use of Cookies, Web Beacons, and Similar Technology for Advertising Networks

If you opt in to the use of targeting cookies and web beacons, you and others may see certain ads for our services or for the Platform on other websites because we participate in ad networks. Ad networks allow us to target our messaging to users through demographic, interest-based, and contextual means. These networks track individuals' online activities over time by collecting information through automated means, including through the use of cookies, web server logs, and web beacons. The networks use this information to show advertisements that may be tailored to an individual's interests. The information our ad networks may collect includes information about your visits to websites that participate in the relevant ad networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our websites and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts and assists other websites and advertising partners to find you or people like you on different platforms, including social media websites.



5.Social and General Information Tools

We use several publicly-available tools and information exchange resources, such as (but not limited to) a blog, a Facebook page, a Twitter account, an Instagram and others (collectively "Social and General Information Tools"). Any information you provide or share while using Social and General Information Tools may be read, accessed, collected by that site and users of that site according to their Privacy Policy.

6. Phishing

Online identity theft and account hacking, including the practice currently known as "phishing", are of great concern. You should always be diligent when you are being asked for your account information and you must always make sure you do that in our secure system. We will never request your login information or your credit card information in any non-secure or unsolicited communication (email, phone or otherwise).

7. Links

The Platform may contain links to other websites, services, or offers that are owned, operated, or maintained by third parties. If you click on a third party link, you will be directed to that third website or service. The fact that we link to a website or service is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not have control over third-party websites and services, and we do not have control over their privacy policies and terms of use.

8.Security of Information

While using any Internet-based service carries inherent security risks that cannot be 100% prevented, our systems, infrastructure, encryption technology, operation and processes are all designed, built, and maintained with your security and privacy in mind. We apply industry standards and best practices to prevent any unauthorized access, use, and disclosure. We comply with all applicable federal laws, state laws, and regulations regarding data privacy.

9.Service Providers

We may employ third-party companies and individuals to facilitate our Platform, to perform certain tasks which are related to the Platform, or to provide audit, legal, operational, or other services for us. These tasks include, but are not limited to, customer service, technical maintenance, monitoring, email management and communication, database management, billing and payment processing, reporting and analytics. We will share with them only the minimum necessary information to perform their task for us and only after entering into appropriate confidentiality agreements.



10.Children's Privacy

We do not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow such persons to become our user. The Platform is not directed and not intended to be used by children under the age of 18 without the consent of a parent or guardian. If you are aware that we have collected Personal Information from a child under age 18 without the consent of their parent or guardian, please let us know by contacting us and we will delete that information.

11.Compliance with Laws and Law Enforcement

We cooperate with government and law enforcement officials to enforce and comply with the law. We may disclose information necessary or appropriate to protect the safety of the public or any person, to respond to claims and legal processes (including but not limited to subpoenas), and to prevent or stop activity that may be illegal or dangerous. You should also be aware that Providers may be obliged to disclose information to law enforcement or other authorities to conform to their professional and legal responsibilities. Specifically, and without limitation, you should be aware that the law requires mental health professionals to disclose information and/or take action in the following cases: (a) reported or suspected abuse of a child or vulnerable adult; (b) serious suicidal potential; (c) threatened harm to another person; (d) court-ordered presentation of treatment.

12.Changes to the Privacy Policy

We may update this privacy statement at our sole discretion. The date of the last revision of this policy appears at the end of this page. We encourage you to periodically review this page for the latest information on our Privacy Policy and practices. Regardless of changes to our Privacy Policy, we will never use the information you submit under our current privacy notice in a new way without first notifying you and giving you the option to stop using the Platform.

13.Contacting us

If you have any questions or concerns about this Privacy Policy or our privacy-related practices, please contact us by clicking the "Contact" link on any page in our website.