Savyn Tech
Privacy Policy

As part of our company values, especially putting members first, we at Savyn are committed to protecting and respecting your privacy in connection with your use of our content and products via our websites, including https://care.savyntech.com/#/ ("Websites"), our applications, including the Savyn platform ("Apps"), or other delivery methods (Websites, Apps, and other delivery methods are collectively referred to as our "Products"). Savyn may deliver coaching services, psychotherapy services (i.e. therapy), and psychiatry services (collectively the "Services") using the Products or via other delivery methods, as applicable. Throughout this Privacy Policy, we will collectively refer to all of our Products and Services as our "Platform." This Privacy Policy covers the "personal information," meaning information about an identified or identifiable individual that is collected through our Product or Services.

We are classified as covered entities under the Health Insurance Portability and Accountability Act (HIPAA). Some components or features of our Platform may include additional privacy notices, such as an optional feature that uses your personal information in a unique way. Similarly, you may have been given access to our Product or Services in a manner that includes additional terms or privacy notices such as from your employer. The language of those terms and privacy notices supplement this Privacy Policy unless there is a conflict, in which case those additional terms and privacy notices will apply. You may follow links contained in our Platform or provided to you by other users to third-party websites or products not operated by us. This Privacy Policy does not apply to third-party websites or products. We strongly suggest you review their privacy policies to understand how your personal information is used and stored by those third parties. Similar to the above point, you may use single sign-on (SSO) features to access our Platform, such as through your social media accounts or through your employer. That use may be subject to your SSO provider's terms and privacy policies, and we encourage you to review them prior to using those features.

1. Collection of personal information

We may collect or process the following personal information about you from what you provide us directly, what we receive from others, and personal information we may automatically collect when you interact with our Platform.

(a) Information you provide to us

Contact information and identifiers. When you use our Platform, we may ask you to provide certain contact information, including your first and last name and email address. We may also collect your social media identification number if you choose to access the Products via a social media account.

Account Information. If you decide to set up an account with us, we may ask you to provide certain additional contact information including, for example, your first and last name, e-mail address (personal and/or work), telephone number, mailing address, employer or company name, job title, student identification number, emergency contact information, as well as password and other authentication-related information. For individuals who participate in special subscriptions and features, including group plans, we may collect

additional personal information, for example, home addresses and names and emails of household members for example, names and emails of household members.

Health information. We will collect the information you provide about your health and wellness as you use our Products or engage with our Services. You may provide this information through the Products, such as through survey responses about your current mental or physical health status, setting your health or wellness goals, or in other inputs that relate to your health or wellbeing. We understand that this information is very sensitive so we handle it with care, including treating this health information as protected health information under HIPAA where applicable.

Profile and demographic information. Through your account in our Product, you may have the opportunity to provide additional information about yourself, such as your age, race and ethnicity, sexual orientation, preferred pronouns, gender or gender identity, sex at birth, marital status, and details about your health and medical history.

Survey information. We may present you with surveys for Product functionality, to provide you with the Services, to provide you with information about our Products and Services that we think may be of interest to you, or for research purposes. These surveys may give you the opportunity to describe certain things about you, your use of the Platform, or feedback on future improvements.

Communication information. When you send or respond to emails, messages, chats, or other communications from Savyn, we may collect your email address, name, and any other personal information you choose to include in the body content of your communications. In addition, when you interact with certain features of our Products, we may collect the content of those communications.

Support information. When you submit a support request or otherwise engage with our support team, we collect the information you provide as part of that interaction. Text entered into this form prior to submission may be collected, retained, and used by Savyn for our business purposes, including by our customer service and other personnel and service providers.

(b) Information from others

In certain circumstances, we may collect personal information about you from others. This may include the following:

If you receive access to Savyn through your employer, health plan, or another party that sponsors your access (your “Benefit Sponsor”), we collect your name and email address and other information that your Benefit Sponsor submits to us to facilitate your enrollment in our Products and Services.
We may collect the name, email address, content engagement, and preferences of individuals that our users identify through our sharing and referral features. We use this data for the sole purpose of sharing content and referring individuals to join the Products.
We may collect personal information from parents or guardians for operating accounts for their dependants aged 13-17 where supported.
If you choose to have your account verified to confirm your eligibility for a select subscription offering, we may allow a third-party platform to access the specific personal information you provide in order to perform the verification. Any failure to provide sufficient information or any response Savyn considers abnormal may result in Savyn refusing (or being unable) to verify your eligibility.

(c) Information we automatically collect

Our Products and Websites may collect information from you automatically during your use which may include:

Browser and device data, such as IP address, device identifier, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons, and the language version of the Websites and Products you are visiting.
Usage data, such as time spent on the Products and Websites including pages visited, links clicked, approximate location, language preferences, performance of features, patterns of use, and the pages that led or referred you to our Products and Websites.

(d) Aggregated, anonymous, and de-identified data

We may create or collect aggregated, anonymous, or de-identified data from personal information by removing, masking, or otherwise altering data components that make the data personally identifiable, or potentially personally identifiable to you ("De-Identified Data"). De-identified data is not personal information and not subject to this Privacy Policy.

2. Use of personal information

We may use your personal information in the following ways:

To provide our Platform, including the delivery of content and interactive features;
To communicate with you regarding our Platform including updates or changes;
To provide you support, answer your questions or requests for information, or handle your complaints;
To inform your Benefit Sponsor, if you have one, about your registration and other information as described in Section 3 below;
To fulfill our obligations under any agreements that we may have with you;
To maintain and improve the quality of our Platform, including performing research and development, understanding user trends, and, in a limited way, understanding the effectiveness of our marketing and advertising such as recording a sales conversion;
To provide you with information about new Products and Services, promotions, and other opportunities that we believe may be of interest to you, whether offered by us or third-party partners, and to personalize, measure, and improve such offers;
To personalize the advertisements you receive about our Platform through third-party platforms, on other websites and apps;
To protect ourselves, you, and others such as by taking actions to prevent fraud and other unlawful or unauthorized activity, creating and maintaining a trusted, secure, and reliable online environment; and
To comply with our legal obligations including meeting regulatory compliance obligations, responding to subpoenas, court orders, or other legal processes; and
to establish or exercise our legal rights or defense against legal claims.

1. Sharing of personal information

We may disclose your personal information with the following categories of third parties:

Our service providers. In some circumstances, we may need to disclose your personal information to a third party so that they can provide a service on our behalf, such as to help deliver the Products or Services that you have requested. These service providers may include services such as analytics, payment processing, advertising and marketing, website hosting, customer and technical support, and other services. Our service providers have access to your personal information only to perform these tasks on our behalf, based on our instructions and are contractually obligated to maintain the confidentiality and security of your personal information, and to not disclose or use your personal information for any other purpose inconsistent with this Privacy Policy and applicable law.

Your integrations. You may connect your account through supported integrations with third parties and we will share your personal information with those third parties. If you do connect an integration, that third party's terms and privacy policy may apply to the personal information shared as a result and we encourage you to review those before setting up the integration.

Your Benefit Sponsor. In limited cases, we may provide certain personal information to your Benefit Sponsor, including your name, email address, registration date, and the date on which you last used our Platform. Generally, we restrict this sharing to not include specific details of your in-app activity or any details about your use of Services, like therapy. This restriction may not apply where sharing some of your activity is necessary for your treatment, payment, or healthcare operations such as if your Benefit Sponsor is your other healthcare provider, health insurance provider, or health plan.

Third-party business partners. In limited cases, we may provide certain personal information to third-party businesses with which we have a joint promotional relationship, bundled subscription offer, or other trusted partnership. This type of sharing will most often be consistent with your notice, consent, direction, and/or reasonable expectations in light of the circumstances in which you provided the personal information.
Third-party advertising platforms. We work with third-party platforms that provide us with analytics and advertising services. This includes helping us understand how users interact with our Platform serving advertisements on our behalf to those who may be interested, and measuring the performance of those advertisements.

Compliance and harm prevention. If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, such as to comply with a subpoena, bankruptcy proceeding, or similar legal process, or in order to enforce our agreements with you; or to protect the rights, property, or safety of Savyn, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. We may also disclose personal information where we believe that doing so would be in accordance with or required by any applicable law, regulation, or legal process.

2. Data security and retention

The security of your personal information is important to us. We follow generally accepted standards, practices, and procedures to protect the personal information submitted to us, both during transmission and once it is received. We maintain appropriate technical, administrative, and physical safeguards to help protect the security of your personal information against unauthorized access, destruction, loss, alteration, disclosure, or misuse.

No security can be fully guaranteed, though. If you have an account with us and you suspect unauthorized use of your account or its credentials, you should contact us immediately using the contact information in Section 9 below.

We will keep your personal information for as long as needed to perform our obligations to you, or for as long as legally permitted. The criteria used to determine our retention periods include (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations). For example, we keep your account information, like your name, email address, and password, for as long as your account exists so that you may access it.

3. Your privacy rights

We believe that you should have control of your personal information. To that end, we provide the following rights to make requests regarding your personal information.

Access. You have the right to know what personal information we collect about you and how we use it. This Privacy Policy serves to inform you about that collection and use. If we have personal information about you, you may also request a copy of that information.

Correction. You have the right to request the correction of your inaccurate personal information.
Portability. You may request an export of your personal information in a structured and machine-readable format such as a .csv or .pdf. Where feasible, we can send that export to a third party you identify.

Deletion. You have the right to request, under certain circumstances, the deletion of your personal information that we collect.

Restriction. You have the right to request that Savyn restrict the use of your personal information in certain circumstances. Please note that in some cases we may not be able to place a restriction due to the use being necessary for Product functionality or delivery of the Services.

No retaliation or discrimination. You have the right not to receive discriminatory or retaliatory treatment for making a request.

Upon receiving your request, we may ask for additional information from you in order to verify the request or confirm how you would like to proceed. We endeavor to respond to a verifiable request without undue delay. If we require an extended amount of time, we will inform you using the email associated with your account or the email you used to make the request.

We do not charge a fee to process your verifiable request unless it is excessive, repetitive, or clearly unfounded. If we determine that your request requires a fee, we will tell you why and provide you with a cost estimate before completing your request.

Your rights are not absolute, and exceptions may apply. These exceptions can arise from different factors including our legal obligations, the rights of others, your or another's safety, and our ability to bring or defend against legal claims. Additionally, we will not fulfill your request if you do not provide sufficient information to verify your identity or to verify that a third party making the request is authorized to act as your representative.

4. Cookies

When you visit our Websites, we may collect information from you automatically through cookies including cookies provided by third parties. We use cookies and the information they collect for a variety of purposes including functionality, analyzing performance, security, personalizing Website content, and advertising. We will get your consent in order to use such trackers or provide you with the opportunity to opt out of cookies, to the extent required by applicable law.

5. Changes

This Privacy Policy is effective as of the date posted at the top. We may update this Privacy Policy from time to time to reflect Platform changes, make corrections, improve clarity, reflect changes in our privacy practices, or as required by applicable laws. When we may make a significant change, such as on how we use your personal information or your rights, we will notify you within the Platform or through another channel such as the email you supplied during account registration, in addition to posting the revised version on our Website. We encourage you to periodically check this Privacy Policy to stay informed about how we handle your personal information.

6. Contact us

We want to hear from you if you have questions, concerns, or requests regarding this Privacy Policy. You can reach us by emailing info@savyntech.com