

Privacy Policy

Last updated November 1, 2020

PLEASE READ THIS DOCUMENT CAREFULLY

The Healthy Change School (“HCS” or “School” or “Creator”) respects your privacy and is committed to being transparent with you about how we handle personal information. This Privacy Policy explains how HCS collects, uses, and shares information about you when you use the Teachable Platform to access our courses and when you use our services, or otherwise interact with us. It also addresses how you can exercise your privacy rights and choices.

The Teachable Platform, which HCS uses to provide its courses to you, is designed to allow Creators like HCS, to build, design, publish, and sell courses, coaching and other services to their Students. This Privacy Policy applies, as does the Teachable Privacy Policy, when you access or use HCS services offered through the Teachable Platform (“HCS Services”), or otherwise interact with us. Your access to the Teachable Platform and use of HCS Services is also governed by our Terms of Use and the Teachable Terms of Use. Capitalized terms used but not defined in this Privacy Policy can be found in the Teachable Terms of Use.

Please read this Privacy Policy carefully prior to accessing the Teachable Platform and using HCS Services. If you have any questions, please contact us at: info@healthychangeschool.com.

Children

As stated in our Terms of Use, you must be at least 18 years old to use the Platform, or, if you are between the ages of 13 and 18, you must have your parent or guardian’s permission to use the Platform. HCS does not knowingly collect or store any personal information from or about children under the age of 13, and we will delete such information if we become aware that it has been submitted through the Teachable Platform.

Parents or guardians who believe that HCS might have any personal information from or about a child under the age of 13 may submit a request to info@healthychangeschool.com for us to remove such information.

Overview

Personal information refers to any information that relates to an identified or identifiable individual. How we handle your personal information will depend on whether we act as a “controller” or as a “processor” for the personal information. The controller is the entity that decides how and why to process personal information. The processor processes personal information on behalf of the controller at the controller’s direction.

When a Student enrolls in an HCS course, Teachable will provide HCS access to a limited set of personal information about the Student (“Student Data”) to enable us to provide our services to the Student. Teachable and HCS may each use Student Data for their own business purposes, at all times subject to the terms of our respective Privacy Policies and Terms of Use. HCS and Teachable each act as an independent controller with respect to their particular use of Student Data.

Personal Information We Collect

We may collect personal identification information from Students in a variety of ways, including, but not limited to, when Students enroll in the HCS School or a HCS Course within the HCS School, subscribe to a newsletter, and in connection with other activities, services, features or resources we make available in our School. Students may visit the HCS School anonymously. We will collect personal identification information from Students only if they voluntarily submit such information to us. Students can refuse to supply personal identification information but doing so may prevent them from engaging in certain School related activities.

Personal Information Teachable Shares With Us

Teachable collects personal information about you in several different ways, depending on how you interact with our Platform. When you visit our website or participate in our Courses, Teachable will share certain personal information about you ("Student Data") with us to allow us to provide you with our services. The set of personal information that Teachable shares with HCS is limited to the following:

1. Account information, including your name and email address
2. Purchase information, including amount paid, your address, and other billing information (but never your complete card number)
3. IP address
4. Information about your participation in our School, including the HCS courses you enrolled in, lecture completion status, course progress, quiz results, and certificates
5. Any messages you exchange with us through Teachable

Teachable will only provide Student Data to us upon the purchase or enrollment of a Student in our courses. Teachable does not disclose any other types of personal information about Students to HCS.

How We Use Personal Information We Collect

Our primary purpose for using your personal information is to communicate with you. We may collect and use Students' personal identification information for the following purposes:

- *To improve customer service*
Information you provide helps us respond to your customer service requests and support needs more efficiently.
- *To personalize user experience*
We may use information in the aggregate to understand how our Students as a group use the services and resources provided in our School.
- *To send periodic emails*
We may use Student email addresses to send Students information and updates pertaining to their order. Student email addresses may also be used to respond to Student inquiries, questions, or other requests.

- *To share our newsletter*

We may use your information to invite you to subscribe to and receive our newsletter and other publications we may make available to you at your request.

How We Share Personal Information We Collect

We do not share your personal information with third parties. We do not sell or otherwise disclose personal information we collect about you for monetary or other valuable consideration.

Legal Disclosures

We may be required to disclose personal information if directed by a court of law or other governmental entity. Without limiting the foregoing, we reserve the right to disclose such information where we have a good faith basis to believe that such action is necessary to:

- comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests
- protect and defend HCS' or a third party's rights and property, or the safety of HCS, our users, our employees, or others
- prevent, detect, investigate and take measures against criminal activity, fraud and misuse or unauthorized use of the Teachable Platform and/or to enforce our Terms of Use or other agreements or policies

To the extent permitted by law, we will attempt to give you prior notice before disclosing your information in response to such a request.

Your Rights and Choices

You have you choices with respect to our use of your personal information. These choices include accessing, updating or deleting your personal information, as well as choosing what communications you would like to receive from us. Depending on your location, you may have additional rights related to your personal information (see the Jurisdiction Specific Provisions section below for more information about location-specific privacy rights).

You can also choose not to provide us with certain personal information, but that may result in you being unable to use certain features of the Teachable Platform because that information may be required for you to register for an account or enroll in an HCS course, participate in our promotional offerings, get customer support or engage in other activities on the Teachable Platform.

Please refer to the 'Data Privacy Requests and Verification' section below for information on how to make a data privacy request.

Accessing, Updating, and Deleting Your Personal Information

You can access and update certain personal information about you by visiting your Teachable [Account Settings](#). You can also submit a data privacy request to receive a copy of personal information that Teachable or we hold about you, free of charge.

If you believe that any personal information we are holding about you is incorrect or incomplete, we will work with you to make corrections deemed necessary. Note that we may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you'd like Teachable or us to delete your account or delete personal information we hold about you, you can submit a deletion request. Note that when we delete your account, personal information that you have shared with others (for example, through comments or an intake form) may still be visible. We also will retain certain personal information about you when reasonably necessary to comply with our legal obligations or for our legitimate business purposes.

Data Privacy Requests and Verification

You can request to access, update, or delete your personal information held by us by emailing us at info@healthchangeschool.com and for personal information held by Teachable at privacy@teachable.com, from the email address associated with your account. If you would like to make a request under the privacy laws of your jurisdiction, please let us know where you reside and which rights you'd like to exercise. For more information about exercising your jurisdiction-specific privacy rights, please see section 'Jurisdiction Specific Provisions' below.

To protect your privacy, we need to verify your identity before we process your data privacy request. As part of this process, we will need to receive the request from you via the email address associated with your account. Depending on the nature of the request, we may also need to obtain additional information necessary for us to verify your identity. You may designate an authorized agent to make a data privacy request on your behalf. To do so, we will need to receive written permission by you or a valid power of attorney, and we may also verify the validity of the request directly with you.

Controlling Promotional Communications

You can opt out of receiving our newsletter or all of our promotional communications through the unsubscribe link in the email or by emailing info@healthchangeschool.com. If you opt out of promotional communications, we may still send you service announcements, administrative and legal notices, and information about your account, without offering you the opportunity to opt out of these communications. If you no longer wish to receive any communications from us (except for those that are legally required), please contact info@healthchangeschool.com to have us delete your account. Please note that opting out of promotional email communications only affects future communications from us.

Controlling Cookies and Similar Technologies

Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Note, however, that deleting cookies or directing your browser to refuse them may limit your ability to use certain portions of the Teachable Platform that require cookies to function. For more information on our use of cookies and similar technologies and how you can opt out, please refer to the Teachable [Cookie Policy](#).

Do Not Track Signals

Your browser may give you the option to send a “Do Not Track” instruction to websites you visit. However, since there is no accepted standard for how a website should respond to this instruction, we do not currently recognize or respond to these signals.

Jurisdiction Specific Provisions

Users in the European Economic Area, UK, and Switzerland

Under the General Data Protection Regulation (GDPR) and other applicable laws, users in the European Economic Area (“EEA”), UK, and Switzerland have the right, under certain conditions, to request access to, rectification of, or erasure of their personal information; request restriction of processing; object to processing; withdraw consent from processing; and the right to data portability.

If you are in the EEA, UK and Switzerland and would like to exercise these rights, please email us at info@healthchangeschool.com pursuant to the ‘Data Privacy Requests and Verification’ section above. Please include the phrase “GDPR request” in the subject line and provide us with your mailing address and state of residence.

HCS only collects and processes personal information about you where it has lawful bases for doing so. The specific legal basis applied to the processing will depend on the context in which the personal information is being processed, including the service used and the type of personal information involved.

HCS uses the following legal bases for processing:

1. *For the performance of a contract.* We will process your personal information to fulfill our contractual obligations with you, such as to provide you with access to our services, to communicate with you regarding your use of our services, and to comply with our Terms of Use.
2. *For legitimate interests.* We will process your personal information for our legitimate interests or those of others (as long as the processing is not outweighed by your data protection interests). This includes but is not limited to, preventing fraud and other abuse, assisting Teachable with the security of the Teachable Platform, protecting our legal rights and interests, and for marketing purposes.
3. *To comply with legal obligations.* We will process your personal information to comply with all applicable laws, regulations, court orders, and government and law enforcement agencies’ requests.
4. *Consent.* We will process your personal information when you have given us consent to do so, such as when you consent to receive certain communications from us.

If you’d like to withdraw your consent or object to our processing of your personal information, please contact info@healthchangeschool.com.

If you believe that we have not adequately addressed your concerns or wish to report an alleged infringement of applicable data privacy laws, you may file a complaint with your local supervisory

authority. Teachable has appointed MCF Legal Technology Solutions Limited as its EU representative for purposes of GDPR. Their EU representative may be contacted via privacy@teachable.com.

Users in California

This section provides details about rights California consumers may exercise under the California Consumer Privacy Act (CCPA) and other privacy and data protection laws, as applicable. Under the CCPA, California consumers have the following rights:

- The right to request to know more about the categories and specific pieces of personal information that we have collected about them and how that information has been used over the past 12 months. They may also request a copy of this information, free of charge
- The right to request that we delete personal information that we have collected about them, subject to certain exceptions
- If a business sells personal information, the right to opt-out of the sale. **At HCS, we do not sell personal information that we collect about our users, as provided in the CCPA**
- The right not to be discriminated against if you choose to exercise any of these rights

Under California's 'Shine the Light' law, California residents have the right to request certain information relating to personal information we have shared with third parties for those third parties' direct marketing purposes. We do not share information with third parties for their direct marketing purposes unless you request us to do so or you expressly consent to it.

If you are a California resident and would like to exercise your rights under the CCPA or California's 'Shine the Light' law, email us at info@healthychangeschool.com pursuant to the 'Data Privacy Requests and Verification' section above. Please specify which privacy right you're exercising in the subject line (for example 'CCPA deletion request') and provide us with your mailing address and state of residence.

Information Security

HCS and Teachable use a range of physical, technical, and administrative security measures to protect your personal information. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. However, no method of data transmission or storage system is absolutely secure, and we cannot guarantee that your personal information will not be accessed, disclosed, altered or destroyed in the event of a breach of any of our or Teachable's security measures.

Where Teachable has given you (or where you have chosen) a password to access certain parts of the Teachable Platform, you are responsible for protecting this password and keeping it confidential. As the safety and security of your information also depends on the precautions you take, we ask you not to share your password with anyone. If you believe your password or the security of your account has been compromised, you should change your password immediately and contact security@teachable.com with any concerns.

Data Retention

We save personal information we collect for as long as it is necessary for the purposes for which the personal information is collected and processed. Generally, we will keep your personal information until your account is deleted, or as needed to provide you with our services. We will retain personal information as necessary to comply with our legal obligations or for our legitimate business purposes.

International Transfers of Information

HCS is based in the United States. Teachable is based in the United States and it stores, processes, and transfers information in and to servers and databases located in the United States. (Teachable may also store, process, and transfer information in and to servers in other countries depending on the location of its affiliates and service providers.)

If you use the Teachable Platform to access our School from outside the United States, including in the EEA, UK, and Switzerland, your information will be transferred to, stored, and processed by Teachable in the United States. By accessing the Teachable Platform or otherwise giving them or us information, you consent to the transfer of information to the United States and other countries outside your country of residence.

Teachable relies on legal bases to transfer information outside of the EEA, UK, and Switzerland. For example, transfers involving personal information of Teachable's Creators located outside the United States are necessary for the performance of the contract between Teachable and those Creators, as established in the Teachable Terms of Use. With respect to the processing of information by Teachable's service providers on their or our behalf, Teachable takes all necessary steps required under applicable law to ensure that their transfer of information across borders is compliant with applicable law. This may include the use of EU model clauses or ensuring that the recipient is certified under the US-EU Privacy Shield framework.

If you'd like more information about the safeguards Teachable has in place, please contact them at privacy@teachable.com.

Third Parties and Other Personal Information Collectors

Except as otherwise expressly specified in this Privacy Policy, this document only addresses the use and disclosure of personal information we collect from you. To the extent that you disclose your personal information to other parties through the Teachable Platform, different rules may apply to how they use and share your personal information. Accordingly, you will need to look at the privacy policies of these third parties to understand their data privacy practices.

As further explained in our Terms of Use, our website and the Teachable Platform may include links to third party websites. We are not responsible for the content of such websites or the protection and privacy of any information which you provide while visiting those sites. We recommend that you exercise caution and review the privacy policies applicable to the websites in question.

No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of our Platform.

Changes to Our Privacy Policy

We encourage you to periodically review this Privacy Policy to stay informed about our privacy practices, as we may review and update our processes from time to time.

If we make a change that, in our sole discretion, is material, we will notify you through email, by posting a notification on our website, or as required by law. Unless otherwise stated, changes to this Privacy Policy will take effect immediately as of the date it is posted. By continuing to use the Teachable Platform after Privacy Policy changes go into effect, you agree to be bound by the revised Privacy Policy.

Contact Us

If you have questions or concerns regarding this Privacy Policy or our handling of your personal information, or if you would like to exercise your rights described in this Privacy Policy, please contact us at:

The Healthy Change School

6917 Arlington Road Suite 306 Bethesda MD 20814

info@healthychangeschool.com

For questions related to the Teachable Platform and Teachable's Terms of Use and Privacy Policy, please contact Teachable at:

Teachable, Inc.

470 Park Avenue South, 6th Floor

New York, New York 10016

Email: privacy@teachable.com