# **SuperGuide Privacy Policy**

This Privacy Policy explains how SuperGuide Ltd. ("SuperGuide," "we," "our," or "us") collects, uses, stores, and protects personal data when therapists and their authorized users (including patients) access or use our services. By opening an account, using, or subscribing to the SuperGuide platform ("Services"), you consent to this Privacy Policy and the processing of personal data as described herein. SuperGuide is committed to safeguarding privacy and handling all information responsibly, transparently, and in compliance with applicable privacy laws, including the Israeli Privacy Protection Regulations and, where applicable, the EU General Data Protection Regulation (GDPR).

#### 1. Definitions

- Therapist A licensed mental-health professional or clinic using SuperGuide.
- Patient A client invited by a therapist to use the platform.
- Personal Data / PII Any information that can identify an individual, directly or indirectly.
- Controller The therapist or clinic determining the purpose and means of processing patient data.
- Processor SuperGuide, which processes personal data on behalf of the therapist.

#### 2. Information We Collect

a. Information Provided by Therapists:

Therapists may provide name, clinic name, email, contact information, license details, payment and billing information, and professional notes or instructions uploaded into the platform.

#### b. Information Provided by Patients:

Patients may provide name, contact information, session notes, reflections, goals, and other therapeutic data.

#### c. Information Collected Automatically:

SuperGuide may collect device type, IP address, language settings, session duration, usage statistics, and cookies or similar technologies.

### d. Information from Third-Party Integrations:

When connecting SuperGuide with other services (e.g., Google Calendar or payment processors), we may receive information in accordance with those providers' terms.

### 3. How We Use Information

We use data to provide, operate, and improve the Services; facilitate secure therapist-patient communication; personalize experiences and generate AI insights; manage billing; ensure compliance; and monitor performance. SuperGuide does not sell personal data or use patient data for advertising.

# 4. Legal Basis for Processing

We process data under one or more of the following legal bases: performance of a contract, therapist consent for processing patient data, legitimate interests (e.g., improving functionality and ensuring security), and compliance with legal obligations.

# 5. Data Sharing

Data may be shared with third-party providers (hosting, payment, analytics) under strict confidentiality agreements, with affiliates assisting in operations, when required by law, or during mergers or acquisitions. All third-party processors are required to handle data securely and under SuperGuide's instructions.

# 6. Cookies and Tracking

We use cookies and similar technologies for functionality, security, and analytics. Users may refuse cookies through browser settings, though this may limit functionality.

# 7. Children's Privacy

SuperGuide is intended for therapists and adult patients. Patients under 18 may only use the Services with verified parental or guardian consent obtained by the therapist.

#### 8. Data Retention and Deletion

SuperGuide retains data as long as accounts are active or as required by law. Upon account termination or therapist request, data may be deleted or anonymized after a defined retention period. Therapists can export data before deletion.

### 9. Data Security

We apply industry-standard security measures to protect data from unauthorized access or misuse. However, no method of online storage or transmission is completely secure, and users share data at their own risk.

#### 10. International Transfers

Data may be processed on servers in or outside Israel, including in the EU or United States. Where data is transferred outside the EEA, SuperGuide uses appropriate safeguards such as Standard Contractual Clauses or adequacy decisions.

### 11. Your Rights

Depending on jurisdiction, you may have rights to access, correct, delete, or restrict processing of your data; withdraw consent; request data portability; or lodge a complaint with a data protection authority. Requests can be sent to privacy@superguide.care.

### 12. Enforcement and Contact

SuperGuide reviews its privacy practices regularly. Questions or complaints may be sent to privacy@superguide.care.

# 13. Updates to This Policy

We may revise this Privacy Policy periodically. Material changes will be communicated via email or notification in the platform. Continued use of the Services constitutes acceptance of any updates.

Last Updated: November 2025 SuperGuide Ltd. Tel Aviv, Israel Email: privacy@superguide.care Website: https://superguide.care