**TEHELE VENTURES, LLC**

**PRIVACY POLICY**

Last modified: September 25, 2025

1. **Introduction**

Tehele Ventures, LLC (“**Tehele**”, “**Company**”, “**we**”, “**our**” or “**us**”) respects your privacy and is committed to protecting it through our compliance with this policy. In this Privacy Policy, “you” means any person who visits our App, Website, uses our Services, emails, texts, or calls us on the phone as well as the business on whose behalf such contact with us is made. This policy describes:

* The types of information we may collect or that you may provide when you visit or use our website (Tehele Ventures App) or any of our applications (collectively, the “**Site**”) or purchase or use our services (collectively, the “**Services**”).
* Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy (the “Policy”) applies only to information we collect in the Site or Services, electronic communications sent through or using the Site or Services, and information you allow us to access or provide to us by virtue of your use of the Site or Services.

This policy DOES NOT apply to information that:

* We collect offline or on any other Company websites, including websites you may access through this Site.
* You provide to or is collected by any third party, including other apps, websites, or content that may link to or be accessible from or through this Site.

These other third parties, along with different websites or applications we utilize, may have their own privacy policies, which we encourage you to read before providing information on or through them. Company has no liability with respect to the use or misuse of personal information by such third-party entities or any failure to comply with such third-party entities’ privacy policies.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, create an account, or use this Site or the Services. By accessing, creating an account, or using this Site, you agree to this Privacy Policy.

All updates to this Privacy Policy are published at the top of this page, with a time-date reference for your convenience. We reserve the right in its sole discretion to amend this Privacy Policy at any time.  Your continued use of the Services and the Site after we make changes is deemed to be acceptance of those changes, so please check the Privacy Policy periodically for updates.  This Privacy Policy applies to all our other websites that post this Privacy Policy.  If you choose to use our Site or Services, your use and any dispute over privacy is subject to this Privacy Policy and our Terms of Service, including limitations on damages, resolution of disputes and application of the law of Delaware.

**II. Privacy of Children**

**Our Site and Services are not intended for children.**  **You must be at least eighteen (18) years of age to use the Site and/or Services related to the Site.  If we learn or have reason to suspect that a user is under age eighteen (18), we will promptly delete any personal information in that user’s account.** **No information obtained by this Site falls within the Children’s Online Privacy Protection Act and is not monitored as doing so.**

**III. What is Personal Information?**

For the purposes of this Privacy Policy and compliance with California law and EU General Data Protection Regulation (“GDPR”), and in accordance with California law and GDPR, personal information (or personal data) relating to an identified or identifiable person, or which identifies, relates to, describes, is reasonably capable of being associated with, or could be linked, directly, or indirectly, with a particular individual or household.  Personal information does not include publicly available information.

**IV. Categories of Information We Collect**

We collect the information you give us when you contact us, access the Site, opt-in to receive alerts or other information from us via email, text, or instant message, or use our Services. We collect your personal information for the purposes described in this Privacy Policy.  The information we collect includes:

* **Identifiers and contact information**, such as your name and address, company name and address, phone number, email address, or social media IDs, logs, analytics, and service usage metrics;
* **Purchase or other commercial information**, such as the Services you use or purchase;
* **Payment information**, such as your payment method and payment information, such as debit or credit card number and information(not stored), and billing address, though please note that we do not store any such information as all payments are handled by Stripe, who also may all payment information;
* **Preference information**, such as your contact and use preferences;
* **Profile and account information**, which may include contact, purchase, and preference information as well as your account password and other information about your profile or account;
* **Communications and interactions**, which may include feedback, comments, testimonials, reviews, email messages, chat sessions, text messages, and phone calls that we exchange with you or which you exchange within or using our Site or the Services;
* **Location or geolocation information** of your device that you use to access our Site, if your device settings allow us to collect location information;
* **Device and browsing information and other Internet activity information**, including information about your phone, tablet, computer, or device, and online browsing activity (collectively, “**automatically collected information**”). Automatically collected information may include IP addresses, unique device identifiers, cookie identifiers, device and browser settings and information, and Internet service provider information.  Automatically collected information also may include information about when and how you access and use our Site, such as the date and time of your visit or use, the websites you visit before coming and after leaving our Site, how you navigate and what you search for using our Site, the Site pages and items you view using our Site, and the items you purchase; and
* **Inferences** about any of the information above that may relate to your preferences, or other matters. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends and to learn more about the demographics of our users.
* **Uploaded Information**. Any other information you explicitly provide to us by virtue of uploading it into the Site or Services, or which you access or use utilizing the Site of Services.

If you do not provide us your personal data, you may not be able to register for an account and some features of the Site may be unavailable to you.

**V. How We Collect Information (Sources)**

We collect information on our Site and during calls and communications with you.  We also obtain information from you and from third parties. For example, we collect and obtain information:

* **You provide**, such as when you visit or use the Site or Services, register for an online account, or upload information into the Site or Services;
* **From third parties**, such as service providers that we use, analytics companies, advertising networks and cooperatives, demographic companies, third parties that provide us with information about you and the different devices you use online, and other third parties that we choose to collaborate or work with;
* **Using cookies and automatic collection methods**.  For example, we and third parties we work with may collect information from the computer, tablet, phone, or other device that you use to access our Site or use our Services, or that you use to open an email or click on an advertisement from us.  Methods we use include:
  + Cookies (which may be session-based or persistent, and are typically small data files that are stored on your hard drive or in connection with your Internet browser);
  + Web beacons or tags (small images embedded into websites or emails that send information about your computer, tablet, phone, or other device when you visit our website, use or mobile application, or open an email we send to you);
  + Website and mobile application log files (which we tend to create automatically in connection with access to and use of our website and mobile application);
  + Flash cookies or Local Stored Objects (which may be placed using Adobe Flash software—learn more about privacy and storage settings for Flash cookies here); and
  + Other technologies (which may be similar to or different than the methods noted above).

Cookies are used to help us understand your preferences for future visits based on previous or current Site activity.  We also use cookies to compile aggregate data about Site traffic and Site interaction so that we can offer better Site experiences, tools and Services in the future.  You may choose to have your computer warn you each time a cookie is being sent.  Your browser can also be set to block cookies, but some features of the Site or our Services may not properly work.  You can make these changes in your browser settings, however, since each browser is a little different, look at your browser’s “Help Menu” to learn the correct way to modify your cookies settings.

**VI. How We Use Information**

We use the information that we collect to conduct our business and to provide you with the best possible Services and experience.  We also may combine any or all of the information that we collect or obtain. Examples of how we use information include:

* **To provide you with the Services**, such as to: process, maintain and service your account(s); to improve the quality of the content we generate for you; and to provide you with better leads and sales strategies;
* **To respond to you**, such as when you: make a request or inquiry or share a comment or concern;
* **For personalization of your experiences with us**, including to: remember your interests and preferences; customize the Services we provide you; facilitate your interactions with our Site and Services; track and categorize your activity on our Site, including by identifying the different devices you use; and to enrich your experience on our Site;
* **For marketing and advertising**, such as to: send you marketing and advertising communications, and to customize the marketing and advertising that we show you (we offer choices about marketing and advertising as noted in the Your Choices section below);
* **For analytics**, such as to: understand how you use our Site and our Services; determine the methods and devices used to access our Site; troubleshoot technical difficulties and errors; and improve Site and Services functionality;
* **For our business purposes**, such as: to operate and improve upon our business and lawful business activities; to train our models and improve the services and information we can provide to both you and other users; to maintain our programs, accounts, and records; for research; to determine your satisfaction with our Site and Services; to detect and prevent fraud or misuse of our Services; and for any other business purpose that is permitted by law;
* **For legal and safety purposes**, such as to: defend or protect us, our customers, you, or third parties, from harm or in legal proceedings; protect our rights; protect our security and the security of our customers, employees, and property; respond to court orders, lawsuits, subpoenas, and government requests; address legal and regulatory compliance; respond to an emergency; and notify you of product recalls or safety

**VII. Who We Share Information With**

Except as disclosed in this Privacy Policy, we do not share your personal information with any companies not part of Tehele or its parent, subsidiaries or related entities, and in no event will we ever sell or rent your personal information.  We may share personal information with third parties for other purposes.  For example, we may share personal information with:

* **Our family of brands and companies**, owned or controlled by us, including our affiliates, parents, and subsidiaries;
* **Third parties and service providers** that provide products or services to us or that provide services to you on our behalf.  We may use third parties or service providers to help with managing our relationship with you, auditing interactions and transactions with you, processing your payments, to us or on our behalf, addressing security, fixing errors, helping us with advertising or marketing, maintaining accounts and providing customer service, helping with our internal research, verifying service quality or safety, and performing any of the other actions or activities allowed under this Privacy Policy;
* **Parties to business transactions** such as those we deal with in mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions.  In these types of transactions, personal information may be shared, sold, or transferred, and it may be used subsequently by a third party; and
* **Additional third parties** such as law enforcement, government entities, courts, or other third parties as required or allowed by applicable law, such as for the legal, protection, and safety purposes described under the “How We Use Information” section above, or otherwise to help prevent harm or fraud to us, you, our customers, or other third parties.  We also may share personal information with third parties upon your request or with your approval, though we may not be able to accommodate all requests.  Finally, we may also share aggregated and/or anonymized data with others for their own uses.

We do not sell, trade, or otherwise transfer to outside parties your personal information, outside of the situations detailed above, unless you consent otherwise. Our ability to use the information, and share it as outlined in Sections VI and VII, is controlled by your consent, or by contract if you have created an account, to the terms of this Privacy Policy, which you may choose to withdraw at any time.

**VIII. Security, Protection and Storage of Your Personal Data**

We take the security of your personal information seriously and use reasonable electronic, personnel and physical measures to protect information from loss, theft, alteration, or misuse.  However, in general, information transmitted through the Internet may not be perfectly secure, and we are unable to guarantee the security of your personal information.  Please be advised that even the best security measures cannot fully eliminate all risks.  We cannot guarantee that only authorized persons will access your information. We are not responsible for third-party circumvention of any privacy settings or security measures.

Wherever we or a trusted third-party service collects sensitive information (such as credit card data), that information is encrypted and transmitted in a secure way.  You can verify this by looking for a closed lock icon at the bottom of your web browser or looking for “https” at the beginning of the website address, also known as a URL, of the web page.  If you make any payments on the Site with a credit card, our payment processor stores your credit card data, ensuring that it is encrypted through PCI-DSS, then deletes the transaction information as soon as it is no longer necessary.  We will never transmit sensitive financial information by email.

We encourage you to take steps to help protect the confidentiality and security of your account and personal information, including by doing the following:

* Reviewing your account periodically and immediately reporting any unexpected activity or unrecognized information;
* Installing the latest security updates and anti-virus software on your computer to help prevent malware and viruses;
* Using complex passwords (a minimum of 7 alpha/numeric cAsE sEnsitive characters);
* Not using the same password on more than one website;
* Not sharing your password with others;
* Password protecting your computer and mobile device; and
* Signing out/logging off of website sessions so that your session is closed, especially when using a public computer.

We are dedicated to protecting all personal information as is necessary.  However, you are responsible for maintaining the confidentiality of your personal information by keeping your password confidential.  You should change your password immediately if you believe someone has gained unauthorized access to it or your account.  If you learn of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody, you should notify us immediately.

**IX. Your Choices and Access Requests**

You have the right to request we disclose what personal information we collect, use, or disclosed, and we strive to offer you choices about how personal information is used and shared.  Your choices include:

* **Email Choices.**  You can opt-out of marketing or advertising emails by using the “unsubscribe” link or mechanism noted in marketing or advertising emails you receive from us.  You may also request to opt-out of marketing or advertising emails by contacting us through one of the methods specified in the “Contact Us” section below and sharing the email address at which you are receiving marketing or advertising emails.
* **Access Requests**. If you have registered for an online account, we allow you to access and update certain personal information that you have provided to us by logging into your online account and using the features and functionalities available there.  Unless alternate procedures are noted for your state in the “Notices, Disclosures, and Jurisdiction-Specific Rights” section below, you may also make a request for access to your personal information by sending an email or writing to us at the address specified in the “Contact Us” section below. Only you, or a person legally authorized to act on your behalf (an “**Authorized Agent**”), may make a verifiable consumer request related to your personal information.  We are not able to grant all access requests, and we may request additional information from you in order to verify your identity before accommodating an access request.
* **Right to Request Deletion of Personal Information.** You have the right to request deletion of your personal information.  You can request the deletion of your personal information by contacting us at [Info@teheleventures.com](mailto:Info@teheleventures.com) with the subject line “Personal Information Deletion” or using the Contact Us form in the Help Menu located at the bottom right of the Site.  Only you, or an Authorized Agent may make a verifiable consumer request related to your personal information.

You may have additional rights in the state in which you reside.  Please see the “Notices, Disclosures, and Jurisdiction-Specific Rights” section below for additional information.

**X. Updating your Personal Information**

It is important that the information contained in our records is both accurate and current.  If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

**XI. Notices, Disclosures, and Jurisdiction – Specific Rights**

* **Links to Other Websites and Services.** Our Site may provide links to other Internet sites, content, or videos (embedded or direct links) maintained by third parties.  We are not responsible for the sites, content, or videos accessed via the links and we have not reviewed the privacy practices of those third parties.  We encourage you to review the privacy practices of those third parties.
* **Browsers Do Not Track Signals.** While we strive to offer you choices when you use our Site and Services, we do not promise that we will be able to receive or honor web browser Do Not Track signals.
* **California Privacy Rights.** Please see the “Your California Privacy Rights” section, below.
* **International Customers.**  If you provide personal information through our Site separate from a purchase, you agree that the personal information will be transferred to and processed in the United States of America and any other country or jurisdiction at our sole discretion.  The laws that apply to the use and protection of personal information in the United States or other countries or jurisdictions in which we transfer or process personal information may be different than the laws and protections in your country.
* **European Privacy Rights.**  If you are a data subject in Europe, you have the right to access, rectify, or erase any personal data we have collected about you through the Site or Services. You also have the right to data portability and the right to restrict or object to our processing of personal data we have collected about you through the Site or Services.  In addition, you have the right to ask us not to process your personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by you.  You may withdraw your consent at any time for any data processing we do based on consent you have provided to us.  Please note, however, that this will not affect the lawfulness of the processing before such withdrawal, nor the processing of personal information done in reliance on certain grounds other than consent. If you have any issues with our compliance, you have the right to lodge a complaint with a European supervisory authority.

To exercise any of these rights, contact us at the address set forth in the section entitled “Contact Us” below and specify which right you intend to exercise.  We will respond to your request within thirty (30) days.  In addition, we may require additional information from you to allow us to confirm your identity.  Please note that we store information, as necessary, to fulfill the purposes for which it was collected, and may continue to retain and use the information even after a data subject request for purposes of our legitimate interests, including, as necessary, to comply with our legal obligations, resolve disputes, prevent fraud and enforce our agreements.

**XII. Your Privacy Rights**

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information.

Many states, including California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Oregon, Tennessee, Texas, Utah, and Virginia provide (now or in the future) their state residents with rights to:

* Confirm whether we process their personal information.
* Access and delete certain personal information.
* Correct inaccuracies in their personal information, taking into account the information's nature processing purpose.
* Data portability.
* Opt-out of personal data processing for:
  + targeted advertising;
  + sales; or
  + profiling in furtherance of decisions that produce legal or similarly significant effects.
* Either limit (opt-out of) or require consent to process sensitive personal data or process personal data of minors under 18 years old.
* Request the categories of third parties with whom we share personal information.
* Request the categories of sources from which your personal information is collected.
* Request categories of personal information sold and categories of third parties to whom it was sold.
* Restrict or object to the processing of your information for direct marketing purposes and in some cases for other specific purposes
* Not receive discriminatory treatment for exercising your privacy rights.

The exact scope of these rights may vary by state. To exercise any of these rights please email us at [Info@teheleventures.com](mailto:Info@teheleventures.com).

Once we receive your request, we will validate the information that you provide with the information we have collected and send a message to the email address you provide in the request, requesting you to verify that it is your email address.  Please follow the instructions in that email to verify your email address.  We will begin processing your request once you verify your email address.  If you maintain a password-protected account with our Site, we may verify your identity through our existing authentication practices for your consumer account.

We do not sell, trade, otherwise transfer your personal information outside of the situations detailed above, so we do not have an opt-out. If you have questions about these practices, please contact us at [Info@teheleventures.com](mailto:Info@teheleventures.com).

**XIII. Data Protection Officer**

If you have questions or comments about this notice you may contract Data Protection Officer at:

Tehele Ventures, LLC.

2021 Fillmore Street,

San Francisco, CA 94115

[Info@teheleventures.com](mailto:Info@teheleventures.com)

**XIV. Right to Non-Discrimination**

We will not discriminate against you for exercising any of your rights under the California Consumer Privacy Act or GDPR.  Unless permitted by applicable law, we will not:

* Deny you products or Services.
* Charge you different prices or rates for products or Services, including through the use of discounts or other benefits or imposing penalties.
* Provide you with a different level or quality of products or Services.
* Suggest that you will receive a different price or rate for products or Services or a different level or quality of products or Services.

**XV. Updates to this Privacy Policy**

We may make changes to this Privacy Policy, and may apply any changes to information previously collected, as permitted by law.  When we make changes to this Privacy Policy, we will notify you by posting the updated Privacy Policy on our Site, and we will update the effective date at the top of this Privacy Policy.  We may also send e-mails to our users who have created an account containing a link to the revised Privacy Policy.

**XVI. Terms of Service**

This Privacy Policy is subject to the Terms of Service, a copy of which is available here: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_.  It is important that you read the Terms of Service, as where there is a conflict between this Privacy Policy and the Terms of Service, the Terms of Service shall prevail.

1. **Accessibility**

We recognize the need to develop electronic and information technology products and services that are accessible and usable by all people, including those with disabilities and special needs.  We provide technical and customer support to accommodate the needs of users with disabilities and address issues related to the accessibility of our Site and Services.

These services include:

* **Customer Technical Support** to answer general and/or technical questions

Contacting us at [Info@teheleventures.com](mailto:Info@teheleventures.com).

Help Menu located at the bottom of your dashboard page on the platform labeled help center.

* **General Product Information**

[Info@teheleventures.com](mailto:Info@teheleventures.com)

* **Privacy Policy**

[Info@teheleventures.com](mailto:Info@teheleventures.com)

1. **Contact Us**

If you have any questions regarding this Privacy Policy or our practices, please contact us at:

2021 Fillmore Street,

San Francisco, CA 94115

[Info@teheleventures.com](mailto:Info@teheleventures.com)