

GDPR Privacy & Data Protection Policy

Effective Date: August 16, 2026

Last Updated: August 16, 2026

1. Introduction

REVOHA (“REVOHA,” “we,” “us,” or “our”) respects the privacy and personal information of the individuals, participants, facilitators, customers, partners, and organizations we serve.

This GDPR Privacy & Data Protection Policy explains how REVOHA collects, uses, stores, shares, and protects personal data and describes the rights available to individuals under the European Union General Data Protection Regulation (“GDPR”) and other applicable data protection laws.

REVOHA is a resilience education company providing educational resources, printed and digital products, workbooks, journals, training, facilitator resources, programs, workshops, assessments, and related resilience-development services.

Where the GDPR applies to our activities, REVOHA processes personal data in accordance with applicable GDPR requirements.

2. Scope

This Policy applies to personal data collected through REVOHA-operated websites, online stores, educational platforms, forms, assessments, training programs, workshops, communications, events, facilitator programs, organizational engagements, and other services operated or administered by REVOHA.

This Policy may apply to customers, website visitors, program participants, facilitators, trainees, organizational contacts, prospective customers, partners, vendors, and other individuals who interact with REVOHA.

Where REVOHA provides services on behalf of another organization, such as an employer, school, nonprofit organization, government agency, or community organization, REVOHA may act as a data processor or service provider rather than the organization responsible for determining how the information is used. In those circumstances, additional privacy terms or agreements may apply.

3. Personal Data We May Collect

Depending upon how you interact with REVOHA, we may collect:

Identity and Contact Information

This may include:

- Name
- Email address
- Telephone number
- Mailing or billing address
- Organization or employer
- Job title or professional role
- Account or registration information

Transaction Information

When you purchase REVOHA products or services, we may process information associated with the transaction, including:

- Products or services purchased
- Order history
- Billing information
- Shipping information
- Transaction records

Payment card information may be processed directly by third-party payment processors. REVOHA does not intentionally store complete payment card numbers unless specifically disclosed and appropriate safeguards are implemented.

Program and Educational Information

When participating in REVOHA programs, training, workshops, or educational experiences, we may collect information such as:

- Program registration information
- Training participation
- Course progress
- Assessment responses
- Check-in responses
- Goals selected by participants
- Survey responses
- Program feedback
- Completion records

- Facilitator training records
- Certificates or credentials issued

REVOHA seeks to collect only the information reasonably necessary to provide, evaluate, or improve its educational programs.

Information You Voluntarily Provide

Certain REVOHA activities may invite personal reflection. Participants may voluntarily provide information concerning experiences, emotions, goals, stressors, or personal circumstances.

Participants should not provide highly sensitive personal information unless specifically requested and necessary for the applicable program.

REVOHA educational programs are not intended to create a medical or psychotherapeutic treatment record.

Website and Technical Information

When you interact with our website or digital services, certain information may be collected automatically, including:

- IP address
- Browser type
- Device type
- Operating system
- Website activity
- Referring pages
- Pages viewed
- Approximate geographic information
- Cookie identifiers and similar technologies

4. How We Use Personal Data

REVOHA may process personal data to:

- Provide products, programs, training, and educational services;
- Process purchases and fulfill orders;
- Create and administer user or participant accounts;
- Register individuals for programs, workshops, or training;
- Deliver digital educational materials;
- Track program participation and completion;
- Administer assessments and program check-ins;

- Communicate with participants and facilitators;
- Provide customer support;
- Issue certificates or training records;
- Evaluate program effectiveness;
- Improve REVOHA products, programs, and educational experiences;
- Maintain website security and functionality;
- Prevent fraud, abuse, or unauthorized access;
- Maintain appropriate business and transaction records;
- Comply with applicable laws and contractual requirements; and
- Send marketing communications where permitted by law.

REVOHA will not use personal data for materially unrelated purposes without an appropriate legal basis and, where required, additional notice or consent.

5. Legal Bases for Processing

Where GDPR applies, REVOHA processes personal data only where an appropriate legal basis exists.

Depending upon the circumstances, our legal basis may include:

Consent

We may rely on your consent for activities such as optional marketing communications, certain cookies, voluntary surveys, testimonials, or other processing where consent is appropriate.

Where processing is based on consent, you may withdraw that consent at any time.

Performance of a Contract

We may process information when necessary to provide a product, program, training, service, or other offering you requested or purchased.

Legal Obligation

We may process personal information when necessary to comply with applicable laws, tax requirements, regulatory requirements, court orders, or other legal obligations.

Legitimate Interests

We may process personal information where reasonably necessary for legitimate business purposes, provided those interests do not override your fundamental privacy rights.

Such interests may include maintaining our services, improving our programs, preventing fraud, maintaining security, administering customer relationships, and understanding how our services are used.

6. Sensitive and Special Category Information

Some information voluntarily provided during resilience education activities could potentially reveal information considered sensitive or “special category” personal data under applicable privacy laws.

REVOHA seeks to minimize the collection of such information.

Where REVOHA intentionally collects or processes special category data subject to GDPR, we will identify an appropriate legal basis and additional conditions for processing as required by applicable law.

REVOHA does not sell sensitive personal information.

Participants should avoid submitting medical records, diagnoses, detailed treatment histories, or other highly sensitive information through general REVOHA forms, workbooks, surveys, or communication channels unless specifically instructed to do so.

7. Assessments, Check-Ins and Program Data

REVOHA programs may use assessments, surveys, reflection exercises, progress indicators, and participant check-ins for educational, developmental, program-evaluation, or research-related purposes.

Unless expressly stated otherwise, these tools are educational and developmental tools and are not intended to diagnose mental health conditions or replace evaluation or treatment by qualified healthcare professionals.

Where practical, REVOHA may aggregate or de-identify program information when evaluating program effectiveness or reporting outcomes to organizational partners.

Individual participant responses will not be disclosed to employers, schools, organizational sponsors, or other third parties except where:

- The participant has authorized the disclosure;
- Disclosure is clearly explained as part of the applicable program;
- The information has been appropriately aggregated or de-identified;

- Disclosure is necessary to provide the contracted service; or
 - Disclosure is required by law.
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8. Cookies and Similar Technologies

REVOHA may use cookies and similar technologies to operate its website, remember user preferences, understand website usage, improve performance, and support marketing activities.

Where required by applicable law, non-essential cookies will be activated only after appropriate consent has been obtained.

Users may also manage certain cookie preferences through their browser or available cookie-management tools.

9. Marketing Communications

REVOHA may send information concerning products, educational resources, programs, events, training opportunities, or company updates where permitted by applicable law.

Where consent is required, REVOHA will obtain appropriate consent before sending such communications.

Recipients may unsubscribe from marketing emails at any time by using the unsubscribe mechanism contained within the communication or by contacting REVOHA.

Withdrawal from marketing communications does not prevent REVOHA from sending transactional or service-related communications when necessary.

10. Sharing Personal Data

REVOHA does not sell personal data.

We may share personal information with service providers and business partners that perform functions on our behalf, including providers of:

- Website hosting;
- E-commerce services;
- Payment processing;

- Email communications;
- Learning-management systems;
- Customer relationship management systems;
- Survey and assessment platforms;
- Cloud storage;
- Analytics;
- Shipping and fulfillment;
- Accounting and professional services; and
- Information security services.

These providers are permitted to process information only as necessary to provide their services or as otherwise permitted by applicable law and contractual arrangements.

We may also disclose personal information when required by law, necessary to protect legal rights or safety, or in connection with a merger, acquisition, financing, restructuring, or sale of all or part of the business, subject to applicable privacy requirements.

11. International Data Transfers

REVOHA is based in the United States. Accordingly, personal data submitted to REVOHA may be processed or stored in the United States or other countries in which REVOHA's service providers operate.

Where GDPR applies to an international transfer of personal data, REVOHA will use an appropriate transfer mechanism or safeguard where required, which may include adequacy decisions, Standard Contractual Clauses, or another legally recognized transfer mechanism.

12. Data Retention

REVOHA retains personal information only for as long as reasonably necessary for the purposes for which it was collected, including providing services, maintaining appropriate business records, satisfying contractual obligations, resolving disputes, enforcing agreements, and complying with legal, accounting, or regulatory requirements.

Retention periods may vary depending upon the type of information and the purpose for which it is processed.

When personal information is no longer reasonably required, REVOHA may delete, securely destroy, anonymize, or de-identify the information in accordance with applicable requirements.

13. Data Security

REVOHA uses reasonable administrative, organizational, technical, and physical safeguards designed to protect personal information against unauthorized access, loss, misuse, alteration, disclosure, or destruction.

These measures may include, where appropriate:

- Access controls;
- Password protection;
- Encryption;
- Secure third-party platforms;
- Limited employee or contractor access;
- Data minimization;
- Secure storage practices; and
- Periodic review of privacy and security practices.

No electronic transmission or storage system can be guaranteed to be completely secure. REVOHA therefore cannot guarantee absolute security of information transmitted electronically.

14. Your GDPR Rights

Where GDPR applies, you may have the right to:

Access — Request confirmation regarding whether REVOHA processes your personal data and obtain access to that information.

Rectification — Request correction of inaccurate or incomplete personal data.

Erasure — Request deletion of personal data in circumstances provided by law.

Restriction — Request that REVOHA restrict certain processing of your personal data.

Data Portability — Request certain personal information in a structured, commonly used, machine-readable format where applicable.

Object — Object to certain processing based upon legitimate interests and object to direct marketing.

Withdraw Consent — Withdraw consent at any time when processing is based upon consent. Withdrawal does not affect the lawfulness of processing conducted before consent was withdrawn.

Automated Decision-Making — Exercise applicable rights concerning decisions based solely upon automated processing that produce legal or similarly significant effects.

You may also have the right to lodge a complaint with the applicable data protection supervisory authority.

These rights are subject to limitations and exceptions established by applicable law.

15. Exercising Your Privacy Rights

To submit a privacy request, contact REVOHA at:

REVOHA

Email: [INSERT PRIVACY EMAIL]

Website: revoha.com

Please include sufficient information for us to understand and respond to your request.

REVOHA may need to verify your identity before fulfilling certain requests in order to protect personal information from unauthorized access or disclosure.

REVOHA will respond within the time periods required by applicable law.

16. Children's Privacy

REVOHA may offer certain educational programs designed for youth through schools, nonprofit organizations, community organizations, athletic programs, or other organizational partners.

Where REVOHA intentionally collects personal information from minors, REVOHA will implement age-appropriate privacy practices and obtain parental, guardian, organizational, or other authorization where required by applicable law.

REVOHA does not knowingly use children's personal information for targeted advertising or sell children's personal information.

Programs involving minors may be subject to additional privacy notices, consent forms, agreements, or organizational requirements.

17. Organizational and Employer-Sponsored Programs

When REVOHA provides programs through employers, schools, nonprofits, government entities, or other organizations, responsibilities for personal information may be governed by agreements between REVOHA and the sponsoring organization.

Whenever reasonably practical, REVOHA seeks to provide organizational clients with aggregated or de-identified program information rather than participants' individual reflection responses.

Participants will be informed when identifiable information is intended to be shared with a sponsoring organization unless disclosure is otherwise authorized or required by law.

18. Automated Decision-Making

REVOHA does not currently intend to make decisions producing legal or similarly significant effects about individuals solely through automated processing of personal data.

Educational assessments, scoring systems, progress indicators, or wellness trend measurements used within REVOHA programs are intended to support education, reflection, facilitation, and program evaluation and should not be treated as automated medical diagnoses or employment decisions.

If REVOHA introduces qualifying automated decision-making in the future, this Policy will be updated and affected individuals will receive any notices required by applicable law.

19. Third-Party Websites and Services

REVOHA's websites or services may contain links to websites, platforms, or services operated by third parties.

REVOHA is not responsible for the privacy practices of independently operated third-party websites or services. Individuals should review the privacy notices of those providers before submitting personal information.

20. Data Protection by Design and Minimization

REVOHA seeks to incorporate privacy considerations into the design and operation of its programs and systems.

In particular, REVOHA seeks to:

- Collect only information reasonably necessary for defined purposes;
 - Limit access to personal information;
 - Avoid unnecessary collection of sensitive information;
 - Use aggregated or de-identified information when practical;
 - Select service providers with appropriate privacy and security practices; and
 - Periodically review the information collected through its programs and platforms.
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21. Data Breaches

If REVOHA becomes aware of a personal data breach, REVOHA will investigate the incident and take reasonable steps to contain and address it.

Where GDPR or another applicable law requires notification to a supervisory authority or affected individuals, REVOHA will provide the required notification within the applicable legal timeframe.

22. EU Representative and Data Protection Officer

Depending upon the scope and nature of REVOHA's activities involving individuals located in the European Economic Area, REVOHA may be required to designate an EU representative or Data Protection Officer.

Where such designation becomes legally required, the appropriate representative's contact information will be added to this Policy.

23. Changes to This Policy

REVOHA may update this GDPR Privacy & Data Protection Policy periodically to reflect changes to our services, technology, business operations, or legal obligations.

When material changes are made, we will update the “Last Updated” date and provide additional notice when required by applicable law.

24. Contact REVOHA

Questions regarding this Policy, REVOHA's privacy practices, or the processing of personal data may be directed to:

REVOHA

Website: revoha.com

Privacy Email: info@revoha.com

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