

# PsychPlus Privacy Policy

**Effective February 27, 2024**

PsychPlus LLC ("PsychPlus" or "We"), respects your privacy and is committed to protecting your privacy. Please read this Privacy Policy ("the Policy") carefully as it sets out important information to help you understand the information we collect, why we collect it, and how you can manage your information. In particular, the policy explains:

- The types of information PsychPlus may collect or that you may provide when you create, activate, access or use PsychPlus' mobile application (the "Digital Health Services") or the [www.psychplus.com](http://www.psychplus.com) website (the "Site" and collectively the "Digital Health Services").
- Our policies and procedures related to the collection, use, maintenance, protection of, and disclosure of your information.

This Policy applies only to information we collect through the Digital Health Services and in email, text, and other electronic communications sent through or in connection with the Digital Health Services.

This Policy does not apply to information and data that:

- We collect offline or on through any other site or applications other than the Digital Health Services, including third party sites you may access through the Digital Health Services.
- You provide to or is collected by any third party (see "THIRD-PARTY DATA COLLECTION" section).
- Third party websites and applications may have their own privacy policies. You should read those terms carefully before providing information on or through them.

## Agreement

If you do not agree with this Policy, do not download, register with, or use the Digital Health Services. The Privacy Policy is part of our Terms of Service. Prior to downloading, registering with, or using the Digital Health Services, please read both the Policy and Terms of Service. By accessing or using any of the Digital Health Services, you agree to be bound by both the Policy and Terms of Service. If you do not agree to be bound by both the Policy and Terms of Service, promptly exit the Digital Health Services. By accessing and using the Digital Health Services, you affirm that you have read the Terms of Service and this Policy and that you understand, agree to and acknowledge all the terms contained in both of them. If you are accepting these Terms for another person ("Family Member") as a parent, guardian, conservator or custodian, you agree to the terms, conditions, and notices contained on behalf of such Family Member. This Policy may change from time to time, as described below. Your continued use of Digital Health Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

## How to Contact Us

Questions, comments and requests regarding this Privacy Policy should be addressed to our Privacy Officer by via email at [privacy@psychplus.com](mailto:privacy@psychplus.com) or regular mail at the address below.

## Persons Under the Age of 18

We are committed to protecting the privacy of children. The Digital Health Services are not intended for the use of persons under the age of 13, and we do not collect personally identifiable information from any person we actually know is a child under the age of 13. Therapy Services are only available to persons age 18 or older, or

those persons at least age 13 but under the age of 18 who have the consent and involvement of a parent or guardian.

“Children” are defined as in the Children’s Online Privacy Protection Act of 1998 and for purposes of this Policy, means persons under the age of 13. We do not knowingly request personally identifiable information from anyone under the age of 13. We will delete any personal information we have received or collected from a child under 13 years of age. If you believe we might have any information from or about a person under 18, please contact us at [privacy@psychplus.com](mailto:privacy@psychplus.com). In addition, parents can request that information about themselves or their children be deleted or revoke parental consent by contacting us via email at [privacy@psychplus.com](mailto:privacy@psychplus.com).

## **Information That We Collect About You**

We collect information from and about users of the Digital Health Services:

- Directly from you when you provide it to us.
- Automatically when you use the Digital Health Services.

## **Information You Provide to Us**

When you when you create, activate, access or use the Digital Health Services, we may ask you provide information that enables us to identify or contact you or to provide services:

- That permits you to be personally identified, such as name, address, email address, telephone number, social security number, as well as information related to your medical history, including information that is considered “protected health information” under certain the Health Insurance Portability and Accountability Act (“HIPAA”) and other state and federal laws (collectively, "PHI").
- That is about you but does not identify you individually, such as certain demographic information.

The information you may provide includes:

- Information provided when completing forms in the Digital Health Services. This includes information provided when you create, activate, or register for an account and when you access or use the Digital Health Services. We may also ask you for information when you report a problem with the Digital Health Services.

Information we may collect from you while using the Digital Health Services:

- Information submitted by health care providers.
- Information you provide related to persons you consent to share your PHI with, such as physicians, other health care providers, family members or care-takers, as well as any communications between you and such persons.
- Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of your Digital Health Services transactions and of the fulfillment of your requests.
- Your search queries while using the Digital Health Services.

## **Information automatically Collected and Cookies and Tracking**

When you use the Digital health Services, we may use technology to automatically collect:

- Usage Details. When you access and use the Digital Health Services, we may automatically collect certain details of your interaction with the Digital Health Services, including traffic data, logs, and other

- communication data and the resources that you access and use on or through the Digital Health Services.
- **Device Information.** We may collect information about the devices you use to interact with the Digital Health Services and your internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
  - **Stored Information and Files.** We may also access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
  - **Location Information.** For purposes of complying with applicable licensure laws, we may collect information about the general location of your device.

If you do not want us to collect this information, do not download, register with, or use the Digital Health Services.

We also may use these technologies to collect information about your activities over time and across third-party websites, apps, or other online services (behavioral tracking). For more information, the “Do Not Track Disclosures” section below for information on how you can opt out of behavioral tracking on or through the Digital Health Services and how we respond to browser signals and other mechanisms that enable consumers to exercise choices about behavioral tracking.

## **Information Collection and Tracking Technologies**

The technologies we use for automatic information collection may include:

The Digital Health Services use cookies. Cookies are small data files that are transferred to your computer through your Web browser. Cookies are used by most websites. We may use cookies, clear gifs, and log file information to: (i) store information so that you will not have to re-enter it during subsequent visits; (ii) provide personalized content in the Digital Health Services and to provide targeted advertising on other sites; (iii) monitor effectiveness of marketing campaigns; (iv) record Digital Health Services’ analytics such as total number of visitors, pages viewed, etc.; and (v) track your entries, submissions and communications. Certain features of our website require cookies in order to function properly. You may be able to refuse to accept cookies by activating the appropriate setting on your device. However, if you select this setting you may be unable to access certain parts of our Digital Health Services.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. If you access the Digital Health Services without changing your cookie settings, you are indicating your consent to receive all cookies while using the Digital Health Services.

We use two types of cookies, session cookies and persistent cookies. Session cookies do not contain personal information and disappear once the browser window is closed. We use session cookies for technical purposes such as to enable you to more easily navigate throughout the Digital Health Services pages.

Persistent cookies store information on your computers or mobile device for longer periods of time and across multiple visits. We do not use persistent cookies to collect personal identifiable information about users. However, we do use persistent cookies to improve web metrics by distinguishing between new and returning users, to anonymously aggregate data on how users use our Digital Health Services, and to remember your voluntarily-provided preferences to create a smoother experience when using the Digital Health Services.

The Digital Health Services may use web beacons in conjunction with cookies to compile statistics about usage of the Digital Health Services. Web beacons are small pieces of code (also called pixels) that are embedded on the pages of applications, websites or emails. We do not use web beacons to collect personal identifiable information about visitors. We may use these technical methods to analyze website performance and reliability data such as timing (e.g., page load) metrics associated with the Digital Health Services. We may also use web beacons in HTML emails that we send users who have opted in to receive email from us, to determine whether our recipients have opened those emails and/or clicked on links in those emails.

## Third-Party Information Collection

When you use the Digital Health Services or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Your internet service provider or mobile carrier.
- Your device manufacturer.
- Search engines and analytics providers.

These third parties may use tracking technologies to collect information about you when you use the Digital Health Services. The information they collect may be associated with your PHI or they may collect information, including PHI, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based directed advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used and we do not monitor your interactions with third parties. Any interactions you have with third parties are solely your responsibility. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## How We Use Your Information

We use information that we collect about you or that you provide to us, including any PHI, to:

- Communicate with you.
- Provide Digital Health Services and its contents, services, and functionality and any other information, products or services that you request from us and for billing of services.
- Match users with health care professionals.
- Transaction processing.
- Process your registration to use the Digital Health Services or an application for a product or service as requested by you.
- Authenticate you on any portion of the Digital Health Services and with vendors acting on our behalf.
- Give you notices about your account, including expiration and renewal notices and to personalize your experience on the Digital Health Services.
- Fulfill any other purpose for which you provide it.
- Carry out our obligations and enforce our rights arising from any contracts or agreements entered into between you and us.
- Notify you when Digital Health Services updates are available, and of changes to any products or services we offer or provide through it.
- Reach out to you, either ourselves or using the appropriate authorities, if we have a good reason to believe that you or any other person may be in danger or may be either the cause or the victim of a criminal act.
- Keep a record of our transactions and communications, including your payment for services.

The usage information we collect helps us to improve our Digital Health Services and to deliver a better and more personalized experience by enabling us to:

- Perform analytics and to improve the Digital Health Services
- Facilitate the provision of software updates and product support.
- Store information about your preferences, allowing us to customize our Digital Health Services for your individual preferences.
- Speed up your searches.
- Recognize you when you use the Digital Health Services.

- Comply with applicable laws, regulations, and legal process and to allow health care professionals with licensure, legal and quality of care requirements.
- Respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- Administer, supervise and monitor the Digital Health Services.
- Measure and improve the quality, effectiveness and delivery of the Digital Health Services.
- Maintain information as otherwise necessary or useful for us to conduct our business, so long as such use is permitted by law or for any other purpose with your consent.

We may also use your information to contact you about our own and third parties' goods and services that may be of interest to you, to the extent permitted by applicable law. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data.

## **Choices Regarding Information Use**

**Email And SMS Messaging:** We may use your email address or phone number to send you messages, such as changes to the Digital Health Services and special offers. If you do not want to receive such notifications, you may opt-out or change your preferences by contacting us at [privacy@psychplus.com](mailto:privacy@psychplus.com). Subject to regulatory requirements, opting out may prevent you from receiving notification including notices regarding updates, improvements or offers. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing related emails from us, we may still send you important administrative messages, from which you cannot opt out.

**Marketing:** We give you choices regarding our use and disclosure of your personal information for marketing purposes. We may use third-party advertising companies to provide advertisements regarding goods and services that may interest you when you access and use the Digital Health Services. You may receive advertisements based on information relating to your access to and use of the Digital Health Services and other websites or online services on any of your devices, as well as on information received from third parties.

## **Aggregated and De-identified Data**

Subject to applicable state and federal laws, including but not limited to our obligations under HIPAA and HITECH, we may license, sell, or otherwise share aggregated, de-identified versions of your PHI and other data ("De-identified Information") with our subsidiaries, affiliates, partners, customers, investors, and contractors for any purpose. You agree and acknowledge that PsychPlus is the sole and exclusive owner of any De-identified Information created by PsychPlus and that you have no ownership or other intellectual property rights in or to such De-identified Information.

## **International Data Transfer**

We may use or process your personal information in the United States or any other country in which our vendors or affiliates are located.

## **Disclosure of Your Information**

We may disclose PHI or other personal information that we collect or you provide:

- To our subsidiaries and affiliates who are bound by contractual obligations to keep PHI and other personal information confidential and use it only for the purposes for which we disclose it to them.
- To health care professionals providing services to you.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep PHI and other personal information confidential and use it only for the

purposes for which we disclose it to them.

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent. To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us and for billing and collection.
- In connection with an asset sale, merger, bankruptcy, or other business transaction.

Subject to applicable laws, if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of PsychPlus, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

## **Your Choices About Our Collection, Use, and Disclosure of Your Information**

We strive to provide you with choices regarding how the PHI and other personal information you provide to us is used. This section describes mechanisms we provide for you to control certain uses and disclosures over your information.

**Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the Digital Health Services may then be inaccessible or not function properly.

**Promotion by PsychPlus.** If you do not want us to use your email address to promote our own or third parties' products or services, you can opt-out by emailing us at [privacy@psychplus.com](mailto:privacy@psychplus.com). You can also always opt-out by logging into the Digital Health Services and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to [privacy@psychplus.com](mailto:privacy@psychplus.com).

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. If you wish to disable cookies from this site, you can do so using your browser. You should understand that some features of many sites may not function properly if you don't accept cookies. For more information about using browsers to manage cookies, please see All About Cookies, [optout.aboutads.info](http://optout.aboutads.info) and [optout.networkadvertising.org](http://optout.networkadvertising.org). You can also refuse to accept Flash cookies from us using Adobe's Flash management tools. You can opt out of Google's use of cookies by visiting Google's Ad Settings.

## **Accessing and Correcting Your PHI and Other Personal Information**

You can review and change your PHI or other information by logging into the Digital Health Services and visiting your account profile page. We cannot change your PHI or other information nor can we delete your PHI or other information except by also deleting your user account. We may deny access to your PHI or personal information when required by law or if we believe such access would cause the PHI or other information of a third party to be revealed.

## **Retention of Information**

We will keep your personal information for as long as your user account is active so you can access your information and the Digital Health Services. We may continue to retain your personal information after you deactivate your user account or stop using PsychPlus, to the extent necessary to comply with our legal obligations, to resolve disputes regarding our users, enforce our agreements or protect our legitimate interests, consistent with applicable law.

## **Data Security**

While using any Internet-based health care service carries inherent security risks, our systems, infrastructure, encryption technology, operation and processes have been designed, built, and maintained to help assure the security and privacy of your information and include technical, physical, administrative and organizational measures designed to secure your PHI and other personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. We apply industry standards to prevent any unauthorized access, use, and disclosure. We comply with all applicable federal laws, state laws, and regulations regarding data privacy.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password or security pin number for access to certain parts of our Digital Health Services, you are responsible for keeping this password confidential. Do not share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your PHI and other personal information, we cannot guarantee the security of your PHI and other personal information transmitted through our Digital Health Services. Any transmission of PHI and other personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## **Social Media Tools**

We use several publicly-available tools and information exchange resources, such as (but not limited to) a blog, a Facebook page, a Twitter account, and others. Any information you provide or share while using Social Media Tools may be read, accessed, collected by that site and users of that site according to their Privacy Policy. Such information should not be considered to be private.

## **Phishing**

Online identity theft and account hacking, including the practice currently known as "phishing", present a material risk of inadvertent data disclosures. You should always be careful when being asked for account information and always make sure you do that in our secure system. We will never request your login information or your credit card information in any non-secure or unsolicited communication (email, phone or otherwise).

## **Links**

The Digital Health Services may contain links to other websites, services, or offers that are owned, operated, or maintained by third parties. If you click on a third party link, you will be directed to that third website or service. The fact that we link to a website or service is not an endorsement, authorization, or representation of our affiliation with that third party, nor is it an endorsement of their privacy or information security policies or practices. We do not have control over third-party websites and services, and we do not have control over their privacy policies and terms of use. You must carefully review their privacy policies.

## **Changes to Our Privacy Policy**

PsychPlus reserves the right to make changes, modifications, improvements or changes to its Policy at any time without any prior notice. Any such modifications will come into effect immediately after posting and your continued use of the Digital Health Services following the posting of such changes to this Policy constitutes your agreement to the revised terms and conditions. As such, PsychPlus recommends you review these terms and conditions on a regular basis. If any of the terms set forth herein are deemed to be invalid, void, or for any reason

unenforceable, then any such term shall be deemed severable and will not affect the validity and enforceability of any remaining terms of the Policy. Notice of changes to this Policy will be provided where required by applicable law.

## **Our Contact Information**

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