

# Privacy Policy

**EFFECTIVE January 1, 2024**

This Privacy Statement (the “Statement”) describes the privacy practices of Phoenix Health Therapy LLC (“Phoenix Health Therapy,” “we,” or “us”) in connection with our website at <https://www.joinphoenixhealth.com> (the “Website”). We may also have other privacy policies, set forth separately in writing, specific to certain categories of individuals, such as residents or citizens of certain jurisdictions.

To the extent that we collect, maintain, use, or disclose protected health information (“PHI”) on behalf of or in connection with services provided to Phoenix Health Therapy or other “covered entities” under the Health Insurance Portability and Accountability Act of 1996 and its subsequent amendments (collectively, “HIPAA”), such information is also subject to the Notices of Privacy Practices issued by Phoenix Health Therapy or those other covered entities. Those Notices may contain additional provisions relating to the use and disclosure of your information and your rights with respect to that information, which may exceed the scope of this Statement.

Our collection, maintenance, use, or disclosure of your health information might also be governed by other laws and regulations. We endeavor to comply with those laws and regulations, as applicable, and, in addition to the practices described herein, we may collect, maintain, use, or disclose your information as required or specifically authorized by those laws and regulations.

**WHAT INFORMATION WE COLLECT**

We collect the following types of information:

- Contact information, including your name, address, email address, and telephone number.
- Account login or verification information.
- Demographic information, including gender and age or date of birth.
- Health information, including information about medical history, current health condition or status, diagnoses, treatment (including options or recommendations), and health insurance.
- Financial information, such as payment card information (e.g. credit or debit card number, CVV code, expiration date) or other financial account information, including insurance information.
- Internet or other network or device activity, such as information about the browsers and devices you use to access our Website, emails, and advertisements (e.g. device type, browser type and language, hardware model, operating system version, unique device identifiers, and IP address) and how you interact with our Website, emails, and advertisements (e.g. features used, content viewed, addresses of referring websites, and the dates and times of interactions).
- Location information, including geolocation when using our Website.
- Electronic, audio, visual, or similar information, such as your communications with us or photos, videos, or other content you submit to us.
- Other information that identifies or can be reasonably associated with you.

## **HOW WE COLLECT INFORMATION**

We collect the types of information described above in three ways: (1) when you provide it to us; (2) when we collect it automatically; and (3) and when we receive it from other sources.

Information you provide to us:

You provide information to us when you register for an account, use our Website, communicate with us, or otherwise submit or publish your information. For example, when you register for an account, you may provide contact information, account login or verification information, demographic information, health information, and financial information. When using the Website, you may provide additional demographic information, health information, financial information, geolocation, or other information about yourself. You might also provide information when communicating with us (for example, regarding our Website or when seeking technical support).

Information we collect automatically:

We automatically collect internet or other network or device activity information about your interactions with our Website, emails, and advertisements, even if you are not logged into an account with us. This information may be collected as follows:

- Cookies and similar technologies:

Cookies and similar technologies are pieces of information stored directly on the device you are using.

Cookies allow us to collect information such as browser type, time spent on the Website and App, pages visited, and language preferences.

We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your online experience and our marketing and advertising efforts. In addition, we use cookies to gather statistical information about usage of the Website and App in order to improve their design and functionality, understand how they are used, and assist us with resolving questions about them.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to

automatically reject any cookies. If you set your browser to reject cookies, parts of the Website and App may not work for you.

- Pixel tags, web beacons, clear GIFs, or other similar technologies.

These may be used in connection with some portions of our Website, emails, or advertisements (for example, to track the actions of our users, compile statistics about usage and response rates, determine whether you have opened and acted upon our emails, and assess the effectiveness of our marketing).

- Analytics and advertising.

We may also use third-party advertising services to provide advertisements for our services. These third parties may collect information about your online activities over time and across third-party websites, and they may be members of industry self-regulatory groups such as the Network Advertising Initiative (NAI), Digital Advertising Alliance (DAA), and European Digital Advertising Alliance (eDAA). The websites for these groups provide more information on interest-based online advertising and how to opt out of receiving interest-based online ads from participating companies.

- Do Not Track requests.

Some browsers may transmit “Do Not Track” or “DNT” signals to the websites you visit. Because there is no common agreement about how to interpret DNT signals, we may not take action in response to them.

- Location information.

We may collect information about the location of your device, including precise geolocation information from your device and imprecise location from, for example, your IP address.

You may be able to adjust the location settings of your device to control whether it communicates location information. See your device settings for more information.

- Purchase information and history.

We may collect information about your transactions with us.

Information we receive from other sources:

We may collect information from other sources, including business partners and service providers with whom we work, including but not limited to Phoenix Health Therapy.

## **HOW WE USE THE INFORMATION**

We may use the information described above in order to:

- Provide the services available through the Website, including membership services; scheduling and other appointment-related services; billing and other payment-processing services.
- Maintain, protect, and improve our Website or other products or services. This may include, for example, customizing our Website to your preferences or interests, making them more compatible with your technology, or otherwise making them easier to use; analyzing how they are used; and evaluating, maintaining, and improving their performance, effectiveness, security, and safety.
- Develop new applications or other products or services.
- Promote our Website or other products or services. This may include, for example, developing and providing promotional and advertising materials about Phoenix Health Therapy that may be of interest to you; analyzing the effectiveness of those materials; and customizing and improving them.
- Communicate and manage our relationship with you. This may include, for example, providing you information about our Website or other products or services or about your transactions with us; responding to your questions, inquiries, or requests; customizing and improving our communications with you and analyzing their effectiveness.
- Address legal issues. This may include, for example, obtaining legal advice and establishing, exercising, or defending legal claims; complying with laws, regulatory requirements, contractual obligations, court orders, other legal process or obligations, or lawful requests from public and government authorities;

detecting, preventing, and responding to fraud, intellectual property infringement, security issues, violations of our agreements, violations of law, or other misuse of our Website or other products or services; and protecting the safety, rights, welfare, or property of Phoenix Health Therapy, you, or others.

## **HOW WE SHARE THE INFORMATION**

We will not sell your information to data brokers or other third parties for money. We may, however, share your information as follows:

- Parent companies, affiliates, and subsidiaries.

We may share your information among our related business entities. We may do so for various purposes, including, for example, to improve or promote our existing Website or other products or services; to develop new applications, products, or services; or for research and development purposes.

- Service providers, vendors, and other business partners.

We may share your information with third parties with whom we work to provide, improve, or develop our Website or other products or services; to perform other Website-related services; or to assist us in analyzing how our Website or other products or services are used.

For example, we may work with vendors providing website hosting; data analysis; other technology services; payment processing; fraud monitoring; services related to product development and maintenance; and communications, marketing, and online and offline advertising services.

- Legal reasons.

We may share your information with third parties when we have a good faith belief that disclosure is necessary to obtain legal advice or establish, exercise, or defend legal claims; comply with laws, regulatory requirements, contractual obligations, court orders, or other legal process

or obligations, or lawful requests from public and government authorities; detect, prevent, or respond to fraud, intellectual property infringement, security issues, violations of our agreements or law, or other misuse of our Website or other products or services; protect the safety, rights, welfare, or property of Phoenix Health Therapy, you, or others, as required or permitted by applicable law.

- Business transfers.

We may share your information with third parties in connection with any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

- Otherwise with your consent.

We may share your information with third parties when we have your consent to do so.

- Anonymized or aggregated information.

We may share anonymized or aggregated information internally and with third parties for any purpose. Such information will not identify you individually.

## **HOW YOU CAN MANAGE YOUR INFORMATION**

If you need to make changes or updates to your personal information, you can speak with your therapist or contact us at [support@joinphoenixhealth.com](mailto:support@joinphoenixhealth.com).

## **DATA SECURITY**

We maintain technical and organizational security measures designed to help protect your personal information from unauthorized access, disclosure, alteration, or destruction. Unfortunately, no data transmission or storage system is 100% secure or error free, and we cannot guarantee the security of the information we collect.

We store the majority of your PHI in our Electronic Health Record (EHR) system. We use a vendor system called Simple Practice as our EHR. Simple Practice implements multiple layers of bank-level encryption to ensure EHR data is protected while it's electronically stored or transmitted. Simple Practice's security measures have been certified through HITRUST—a third-party assessor that verifies the strictest level of HIPAA compliance. Additional information can be found on Simple Practice and their security measures here: <https://www.simplepractice.com/features/security/>.

We also will regularly move a limited amount of PHI information such as your name and contact details to our Operations Management System (OMS) powered by Google Workspace to support operational tasks like billing, communications, and auditing therapists for quality control. All of your PHI data in our OMS is also encrypted to keep your data safe.

Phoenix Health Therapy has signed a Business Associates Agreement (BAA) with the vendors that power both our EHR and OMS to ensure they will appropriately safeguard the PHI they receive.

## **DATA RETENTION**

We retain your information as long as necessary to fulfill the purposes outlined in this Statement, unless a longer retention period is required or allowed by law.

## **LINKS TO OTHER SITES**

Our Website may contain links to other sites, mobile applications, or third-party services, or plug-ins from social-media platforms or other third parties. Please note that these third-party sites and plug-ins are not operated by us. Therefore, we strongly advise you to review the third parties' privacy policies. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services, except as expressly noted.

## **CHILDREN'S PRIVACY**

Our Website is not intended for anyone under the age of 18. We do not knowingly collect personally identifiable information from children under 18. In the case we discover that a child under 18 has provided us with personal information, we will delete such information from our servers. If you are a parent or guardian and you are aware that your child has provided us with personal information, please contact us.

## **CHANGES TO THIS PRIVACY POLICY**

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately after they are posted on this page.

## **CONTACT US**

If you have any questions or comments about this Statement, do not hesitate to contact us at [privacy@joinphoenixhealth.com](mailto:privacy@joinphoenixhealth.com).