

Foresight Mental Health Privacy Notice

Last Updated/Effective Date: August 22, 2024

Foresight Mental Health, PLLC and its affiliates and subsidiaries (“**Foresight Mental Health**,” “**Foresight**,” “**we**,” “**us**,” or “**our**”) respect your privacy. This Privacy Notice describes the processing of Personal Information (defined below) that is provided, collected, or disclosed in the course of providing our services to you (“**Services**”) and on the websites, applications, social media pages, and other platforms that link to this Privacy Notice, including when you apply for a job with us. It also describes rights you may have under applicable laws.

In some instances, your Personal Information may constitute Protected Health Information under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”). In those instances, please review our HIPAA Notice of Privacy Practices, which is supplemented by this Privacy Notice.

1. Personal Information We Collect

We may collect a range of Personal Information. “**Personal Information**” means information that uniquely identifies, relates to, describes, or is reasonably capable of being associated with or linked to you.

The types of Personal Information we collect may include:

- *Contact Information* – If you submit an inquiry, register for an account, or provide information on or through our Services, we may collect your contact information. This may include your name, address, email address, demographic information, and phone number.
- *Commercial Information* – If you submit an inquiry, or provide information on our website, we may collect commercial information including information about Services you have shown interest in.
- *Usage Information* – When you use our website, we may automatically record information, including your Internet Protocol address (IP Address), geolocation of your device, browser type, referring URLs (e.g., the website you visited before

coming to our website), domain names associated with your internet service provider, and any other information regarding your interaction with our website.

- *Employment Information* – If you apply for employment with us, we will collect Personal Information related to your potential employment, including your education and employment history, address and contact information, demographic information, and any other information included in your resume or application. If you are employed by us, we will collect additional Personal Information related to your employment, including financial information, such as, banking details, tax information, payroll information, and withholdings, health and safety information, such as health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information, information systems information, such as your search history, browsing history, login information, and IP addresses on our information systems and networks, sensory or surveillance information, such as call monitoring and video surveillance, your preferences, characteristics, attitudes, intelligence, abilities, and aptitudes.
- *Communication Information* – We may collect Personal Information contained within your communications with us, including audio, electronic, or visual information, screen sharing views, and any files provided to us via email, chat functionality, social media, phone, or otherwise. Where permitted by applicable law, we may collect and maintain records of calls and chats with our agents, representatives, or employees via message, chat, post, or similar functionality.
- *Business Partner Information* – If you are a vendor, customer, service provider, or supplier to our business, we may collect your e-mail addresses, business addresses, phone numbers, tax information such as EIN and your business' credit cards or financial bank information, such as account numbers.

2. How We Collect Personal Information

- *Directly From You* – We collect Personal Information that you provide to us, for example, if you choose to contact us, request or purchase Services or information from us, or sign up to receive updates.
- *From Third Parties* – We may collect Personal Information from third parties including, business partners, subcontractors, advertising networks, analytics providers, and search information providers, who may provide us with Personal Information about you.
- *Through Online Tracking Technologies* – We use cookies and similar technologies to collect Personal Information related to activity on our website. For additional information regarding our use of these technologies, see the *Cookies and Tracking Technologies* section below.

3. How We Use Personal Information

To the extent permitted by applicable law, we use Personal Information:

- *To provide and personalize our Services*, such as providing our Services, processing payments, providing customer service, maintaining or servicing

accounts, verifying customer information, creating and maintaining business records, verifying eligibility, undertaking or providing similar services, and personalizing your website experience to deliver content and service offerings relevant to your interests, including targeted offers and ads through our website, third-party sites, and via email or text message (with your consent, where required by law).

- *For internal research and development*, such as testing and verifying the quality of our Services, improving the quality of our Services, and creating new Services.
- *For marketing*, such as sending information about our Services, including using your information to send you messages, notices, newsletters, surveys, promotions, or news about events.
- *For communicating with you*, such as responding to your questions and comments.
- *For employment purposes*, such as compliance with applicable employment laws and regulations, recruiting and evaluating job applicants and candidates for employment, conducting background checks, managing the employment relationship with us (e.g., onboarding, timekeeping, payroll, employee benefits administration, training and development, creating and maintaining employee accounts, reaching out to emergency contacts when you are not reachable or are injured or ill, workers' compensation claims management, job performance, other human resources purposes), managing and monitoring employee access to facilities, conducting internal audits and workplace investigation, investigating and enforcing compliance with our policies and procedures, engaging in corporate transactions requiring review of employee records, maintaining commercial insurance policies and coverages, including workers' compensation and other liability insurance, performing workforce analytics and benchmarking, administering our operations, for client marketing purposes, and to exercise or defend our legal rights.
- *For legal, security, or safety reasons*, such as protecting our and our users' safety, property, or rights; complying with legal requirements; enforcing our terms, conditions, and policies; detecting, preventing, and responding to security incidents; and protecting against malicious, deceptive, fraudulent, or illegal activity.
- *As part of a corporate transaction*, such as in connection with the sale of part or all of our assets or business, the acquisition of part or all of another business or another business' assets, or another corporate transaction, including bankruptcy.

4. How We Disclose Personal Information

We may disclose your Personal Information in the following circumstances:

- *Service Providers* – We disclose your Personal Information with third party service providers as necessary to enable them to support our Services or other aspects of our business.
- *Affiliates and Subsidiaries* – We may disclose your information to the Foresight Mental Health family of companies for their and our business purposes, including

to provide you information about the products or services we think may interest you.

- *Business Partners* – We may disclose your information to third parties that may use it for their own purposes, including companies that operate cookies and other advertising and marketing partners, social media companies, and other business partners. We may also disclose Personal Information with trusted business partners or corporate affiliates. For example, we may disclose your Personal Information with a company whose products or services we think may be of interest to you or who we co-sponsor a promotion or service with. Further, we allow third parties to control the collection of personal information through cookies and other tracking technologies. These third parties use the data to allow us to understand how our Sites and Apps are used, to understand your preferences and interests, and to customize advertisements to those interests and preferences. For more information on our use of cookies and similar tracking technologies, please review the “Cookies and Other Tracking Technologies” section below.
- *Legal Obligation or Safety Reasons* – We may disclose Personal Information to a third party when we have a good faith belief that such disclosure of Personal Information is reasonably necessary to (a) satisfy or comply with any requirement of law, regulation, legal process, or enforceable governmental request, (b) enforce or investigate a potential violation of any agreement you have with us, (c) detect, prevent, or otherwise respond to fraud, security or technical concerns, (d) support auditing and compliance functions, or (e) protect the rights, property, or safety of Foresight Mental Health, its employees and clients, or the public against harm.
- *Merger or Change of Control* – We may disclose Personal Information to third parties as necessary if we are involved in a merger, acquisition, or any other transaction involving a change of control in our business, including but not limited to, a bankruptcy or similar proceeding. Where legally required, we will give you prior notice prior to such disclosure.

5. Cookies and Other Tracking Technologies

We and our service providers may use cookies and similar technologies to collect usage and browser information about how you use our website. We process the information collected through such technologies, which may include or be combined with Personal Information, to help operate certain features of our website, to enhance your experience through personalization, and to help us better understand the features of our website that you and other users are most interested in.

We allow or enable third parties to collect Personal Information in order to provide their interest-based advertising services, and we use Google Ads and other third parties to serve ads for our Services across various websites. To opt-out of this type of advertising by Google, to customize your ad preferences, or to limit Google’s collection or use of your data, visit [Google’s Safety Center](#) and [Google’s Ad Settings](#) and follow [Google’s personalized ad opt-out instructions](#). Opting out will not affect your use of our Services.

We use analytics services, including GA4, to assist us with analyzing our website traffic. These services utilize cookies and other technologies that collect your Personal Information. To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data when you use our partners' websites or apps.](#)" You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

In addition, most browsers provide you with the ability to block, delete, or disable cookies, and your mobile device may allow you to disable transmission of unique identifiers and location data. If you choose to reject cookies or block device identifiers, some features of our Services may not be available, or some functionality may be limited or unavailable. Please review the help pages of your browser or mobile device for assistance with changing your settings. We do not respond to Do Not Track ("DNT") signals sent to us by your browser at this time.

6. How Long We Keep Your Personal Information

We will retain each category of your Personal Information for as long as necessary to fulfill the purposes described in this Privacy Notice, unless otherwise required by applicable laws. Criteria we will use to determine how long we will retain your Personal Information include whether we need your Personal Information to provide you with our Services you have requested; we continue to have a relationship with you; you have requested information or Services from us; we have a legal right or obligation to continue to retain your Personal Information; we have an obligation to a third party that involves your Personal Information; our retention or recordkeeping policies and obligations dictate that we retain your Personal Information; we have an interest in providing you with Personal Information about our Services; or we have another business purpose for retaining your Personal Information.

7. How We Protect Personal Information

We use commercially reasonable efforts to protect the confidentiality and security of Personal Information. However, despite these efforts to store Personal Information in a secure environment, we cannot guarantee the security of Personal Information during its transmission or its storage on our systems.

8. International Use of our Services

Our website is hosted in the United States. If you are visiting our website from outside of the United States, please note that by providing your Personal Information, it is being transferred to, stored, collected, or processed in the United States, where our servers are located and operated.

9. Children’s Privacy

We do not knowingly collect or solicit any Personal Information from children under the age of 13 without verified written parental consent. In the event that we learn that we have collected Personal Information from a child under the age of 13, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their Personal Information, you can email compliance@foresightmentalhealth.com.

10. Links to Third-Party Websites

We are not responsible for the practices employed by any websites or services linked to or from our Services, including the information or content contained within them. We encourage you to investigate and ask questions before disclosing Personal Information to third parties, since any Personal Information disclosed will be handled in accordance with the applicable third party’s privacy notice.

11. Notice to California Residents

This section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (collectively “**CCPA**”), where “**Personal Information**” has the definition set forth in the CCPA.

Foresight Mental Health makes the following disclosures regarding the Personal Information it has collected within the 12-month period preceding the Effective Date of this Privacy Notice:

Sources of Personal Information

We collect Personal Information from the categories of sources detailed in the *How We Collect Personal Information* section above.

Use of Personal Information

We collect Personal Information for the business and commercial purposes detailed in the *How We Use Personal Information* section above.

Disclosure of Personal Information

The categories of third parties to whom we disclose Personal Information for a business or commercial purpose or to whom we sell or share Personal Information are summarized in the chart below. We do not knowingly sell or share the Personal Information of minors under the age of 16.

Categories of Personal Information We Collect	Categories of Recipients to Whom We Disclose Personal Information for a Business or Commercial Purpose	Categories of Third Parties to Whom We Sell or Share Personal Information
Identifiers	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	<ul style="list-style-type: none"> ● Third-party marketers ● Analytics providers ● Other third parties that set cookies and other online tracking technologies on our website.
Personal information, as defined in the California customer records law	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	We do not sell or share this category of Personal Information.
Commercial Information	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	We do not sell or share this category of Personal Information.

<p>Characteristics of protected classifications under California or Federal Law</p>	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	<p>We do not sell or share this category of Personal Information.</p>
<p>Internet or other similar network activity</p>	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	<ul style="list-style-type: none"> ● Third-party marketers ● Analytics providers ● Other third parties that set cookies and other online tracking technologies on our website.
<p>Geolocation data</p>	<ul style="list-style-type: none"> ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	<ul style="list-style-type: none"> ● Third-party marketers ● Analytics providers ● Other third parties that set cookies and other online tracking technologies on our website.
<p>Inferences drawn from other Personal Information</p>	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes 	<p>We do not sell or share this category of Personal Information.</p>

	<ul style="list-style-type: none"> ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	
Professional or employment-related information	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure 	We do not sell or share this category of Personal Information.
Sensitive Personal Information	<ul style="list-style-type: none"> ● Affiliates and subsidiaries ● Service providers ● Business partners ● Third parties for legal, security, and safety purposes ● Third parties in connection with a corporate transaction ● Other entities to which you have consented to the disclosure <p>Please note, we do not use or disclose sensitive personal information for purposes that would trigger the right to limit use and disclosure under the CCPA.</p>	We do not sell or share this category of Personal Information.

Other California Privacy Rights

Under California Civil Code Section 1798.83, individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of Personal Information to third

parties for the third parties' direct marketing purposes, if any. To make such a request, please contact us using the information in the *Contact Us* section below. Please be aware that not all information sharing is covered by these California privacy rights requirements and only information on covered sharing will be included in our response. This request may be made no more than once per calendar year.

12. Your Privacy Rights and How to Exercise Them

Depending on where you live, you may have the following rights with respect to your Personal Information under applicable data protection laws:

- *Access* – You may have the right to know what Personal Information we have collected about you and to access such data.
- *Data portability* – You may have the right to receive a copy of your information in a portable and readily usable format.
- *Deletion* – You may have the right to delete your Personal Information that we have obtained, subject to certain exceptions.
- *Correction* – You may have the right to correct inaccuracies in your Personal Information.
- *Opt out of certain processing* – You may have the right to: (a) opt out of the processing of your Personal Information for purposes of targeted advertising, (b) opt out of the sale or sharing of your Personal Information, (c) limit the use of your Sensitive Personal Information (if applicable), and (d) opt out of the processing of your Personal Information for profiling in furtherance of decisions that produce legal or similarly significant effect concerning you.

Additionally, if you withdraw your consent or object to processing of your Personal Information, or if you choose not to provide certain Personal Information, we may be unable to provide some or all of our Services to you.

To exercise any of the privacy rights afforded to you under applicable data protection laws, please submit a request to us by one of the following methods:

- Calling us toll free at (888) 588-8995
- At this email: compliance@foresightmentalhealth.com

You may also initiate any opt outs by broadcasting an Opt-Out Preference Signal, such as the Global Privacy Control (GPC). We honor Opt-Out Preference Signals, including GPC. If you choose to use an Opt-Out Preference Signal, you will need to turn it on for each supported browser or browser extension you use.

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this Privacy Notice, which means we will not deny Services to you, provide different prices or rates for Services to you, or provide a different level of Services to you. Only you, or an agent that you authorize to act on your behalf, may make a request

related to your Personal Information. You may also make a request on behalf of your minor child.

We must verify your identity before fulfilling your requests, and if we cannot verify your identity, we may request additional information from you. If you are an authorized agent making a request on behalf of another person, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney. We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period.

We do not charge a fee to process or respond to your requests unless they are excessive or repetitive. If we determine that a request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request. We may deny certain requests, or only fulfill some in part, as permitted or required by law. If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you will be notified of our appeal process in our response to your request.

13. Changes to this Privacy Notice

Please note that we may modify or update this Privacy Notice from time to time, so please review it periodically. We will provide notice if material changes are made. Unless otherwise indicated, any changes to this Privacy Notice will apply immediately upon posting to our website.

14. Contact Us

If you have any questions about our practices or this Privacy Notice, please contact us at (888) 588-8995. You may also write to us at 1000 G ST, Suite 125, Sacramento, CA 95814.